



## RECORD OF PERSONAL DATA PROCESSING ACTIVITY

*In accordance with Article 31 of the Regulation (EU) 2018/1725 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<sup>1</sup> (hereinafter referred to as the Regulation), individuals whose personal data are processed by the Research Executive Agency (hereinafter referred to as REA or Agency) in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing activities.*

Record No: 50  
Created on (date): 10/12/2021  
Last update (date):

### NAME OF THE PROCESSING ACTIVITY

Internal events organised by REA COMM (information sessions, parties, drinks)

### GROUND FOR THE RECORD (TICK THE RELEVANT ONE):

- Regularization of a data processing activity already carried out
- Record of a new data processing activity prior to its implementation
- Change of a data processing activity.

### IDENTIFICATION OF THE DATA CONTROLLER

European Research Executive Agency (REA)

<sup>1</sup> 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295/39 of 21.11.2018).

## **1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION**

### **(PART I - PUBLISHABLE VERSION FOR EXTERNAL PUBLICATION)**

#### **1.1. Name and contact details of controller**

The controller is the European Research Executive Agency (REA) represented by its Director. For organisational reasons, the role of the data controller has been entrusted by the Director and is exercised by the Head of Unit REA.D.2 People and Workplace, (the delegated controller). The delegated controller may be contacted via may be contacted via [REA-INTERNAL-COMMUNICATION@ec.europa.eu](mailto:REA-INTERNAL-COMMUNICATION@ec.europa.eu) .

#### **1.2. Name and contact details of the Data Protection Officer (DPO)**

REA Data Protection Officer  
[REA-DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:REA-DATA-PROTECTION-OFFICER@ec.europa.eu)

#### **1.3. Name and contact details of joint controller (where applicable)**

Not applicable

#### **1.4. Name and contact details of processor (where applicable)**

For communication on the event done via the Agency's intranet on My IntraComm, the Head of Unit Internal Communication Unit HR.DDG.A.4. The first point of contact is [HR-MAIL-A4@ec.europa.eu](mailto:HR-MAIL-A4@ec.europa.eu). DPR-EC-01888.1

External providers for the deployment of communication services and dispatch of communication materials. The external service providers vary according to the specific needs of the Agency. The name of the provider(s) if any will be indicated in the DPN.

#### **1.5. Purpose of the processing**

The REA Internal Communication organises a variety of internal events for REA staff only. These internal events are organised for information or celebratory purposes: information sessions, parties, drinks.

The invitation to these internal events is ensured via an Outlook invitation that be sent either by the Director's office, by the REA Internal Communication team . The distribution of processing activities between the Director's office and the Internal Communication team is provided under point 1.10.

The invitation clearly indicates how the data subjects can give their explicit consent to appear on photos, as well on videos or on publications. In practice, consent is collected by the means of the voting button (yes/no) embedded in the invitation sent to data subject via Outlook.

The purpose of processing personal data of staff is to organise the event and communicate internally about it afterwards.

This communication can be undertaken by means of emails, of REA's internal newsletter, of its internal magazine (The READER) or via REA intranet. This communication may include the use of pictures and audio-visual material subject to data subjects' consent.

Participation to these events is not mandatory and is not conditional to the provision of consent by data subjects for the collection and processing of non-mandatory personal data described under point 1.10. Data subjects who do not provide their consent to appear on pictures and audio-visual material will receive in advance a badge to wear visibly at the event. When possible, a picture-free area will also be indicated.

In addition, data subjects may withdraw at any time their consent for the processing of the non-mandatory personal data by notifying the controller via [REA-INTERNAL-COMMUNICATION@ec.europa.eu](mailto:REA-INTERNAL-COMMUNICATION@ec.europa.eu).

For digital and hybrid events, third parties providing the digital platforms authorised by DIGIT<sup>2</sup> process personal data. In this context and when applicable, data subjects are duly informed of the data protection policy of those third parties via the data protection notice.

## **1.6. Legal basis for the processing**

This processing activity is based on:

Article 5(1)(a) of the Regulation, it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in REA by the following legal acts:

- Commission Implementing decision (EU) 2021/173 of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the European Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU;
- Commission decision C(2021)952 of 12.2.2021 delegating powers to the European Research Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of Research and Innovation, Research of the Fund for Coal and Steel and Information Provision and Promotion Measures concerning Agricultural Products comprising, in particular, implementation of appropriations entered in the general budget of the Union;

- Article 5(1) (d) of the Regulation based on the explicit consent of the data subject for the non-mandatory personal data indicated below:

Consent for the collection and processing of the non-mandatory personal data described under point 1.10 is collected via the yes/no button of the Outlook invitation. Participation to the event is not conditional to the provision of consent for the non-mandatory personal data described under point 2.10. Data subjects who did not provide their consent to appear on pictures and audio-visual material will be provided in advance with a badge to wear visibly at the event. When possible, a picture-free area will also be indicated.

For online events, data subjects will be able to switch off the microphone and camera.

Furthermore, data subjects may withdraw at any time their consent for the processing of the non-mandatory by notifying the controller via [REA-INTERNAL-COMMUNICATION@ec.europa.eu](mailto:REA-INTERNAL-COMMUNICATION@ec.europa.eu) without affecting, the lawfulness of the processing.

## **1.7. Categories of data subjects**

REA staff invited to the event by the Director's office or the REA Communication sector.

Commission staff or staff of other Commission executive agencies, Institutions or other EU bodies that may be invited to the event as participants or as presenters.

External persons who may be invited to REA internal events as presenters.

## **1.8. Categories of personal data**

### Mandatory data linked to the invitation

- Last name, first name, service, e-mail address.

### Non-mandatory data linked to the participation

- Pictures and audio-visual material taken during the event.

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<sup>2</sup> Such as Skype for business, WebEx, Microsoft Teams, Sli.do etc.

## **1.9. Retention time (time limit for keeping the personal data)**

The Controller only keeps the data for as long as follow-up actions to the event are necessary, considering the purpose(s) of the processing of personal data: the event, its related management and subsequent internal communication after the event.

All personal data will be deleted from databases 2 year after the last action in relation to the event.

For personal data published on the Agency's intranet, retention time is according to the decentralised corporate record [DPR-EC-01888.2](#):

- Names/pictures/videos/recordings of social events: 3 months
- Names/pictures/videos/recordings of professional meetings and events: 2 years  
News published and their pictures/videos/recordings: Kept and archived as part of the Commission history (see Record DPR-EC-00880.1)
- Content of historical relevance, e.g. important REA milestones such as the 10-years anniversary celebrations: Kept and archived for an indefinite period.

## **1.10. Recipients of the data**

### **Who will have access to the data within the Agency?**

#### For physical events:

- a) Mandatory data linked to the invitation (Last name, first name, service, e-mail address):
  - The Director's office and authorised staff of the REA Internal Communication team.
- b) Non-mandatory data linked to the participation (pictures and audio-visual material taken during the event):
  - Authorised staff of the REA Internal Communication team.

#### For digital events

- a) Mandatory data linked to the invitation (Last name, first name, service, e-mail address):
  - The Director's office and authorised staff of the REA Internal Communication team.
- b) Mandatory data linked to the online participation (Last name, first name, service, e-mail address):
  - Third-party platform providers authorised by DIGIT such as Skype for business, WebEx, Microsoft Teams, sli.do.
- c) Any non-mandatory data shared during the online event by the data subject:
  - Third-party platform providers authorised by DIGIT such as Skype for business, WebEx, Microsoft Teams, sli.do.

### **Who will have access to the data outside the Agency?**

- Pictures and audio-visual material published on the Agency's intranet is accessible to all Directorates-General and Executive Agencies of the European Commission, as well as other EU institutions/agencies/bodies/joint-undertakings staff.

## **1.11. Transfers of personal data to third countries or international organisations**

Not applicable

## **1.12. High-level description of security measures**

All data in electronic format that are processed during this processing activity are stored on the servers of the European Commission or of the REA, the operations of which abide by the European Commission's security decisions and provisions established by the Directorate of Security for this kind of servers and services.

Appropriate access rights and access control are put in place. Only designated staff on a need to know basis has the possibility to access the data for the legitimate performance of tasks within the competence of the recipient.

### **1.13. Data Protection Notice**

A Data Protection Notice (DPN) relevant to this data processing activity is provided to data subjects with the Outlook invitation.