



**EUROPEAN COMMISSION**  
RESEARCH EXECUTIVE AGENCY

## **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 (Regulation), individuals whose personal data are processed by the Research Executive Agency (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.

### **NAME OF THE PROCESSING**

REA events related to grant management

### **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**

Research Executive Agency (REA)

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

### 1.1. Name and contact details of controller

The controller is the Research Executive Agency (REA). For organisational reasons, the role of data controller is exercised by the REA Director. The controller may be contacted via email: [Marc.TACHELET@ec.europa.eu](mailto:Marc.TACHELET@ec.europa.eu).

The Head of Unit organising a particular event is entrusted with collecting and processing of personal data in the capacity of delegated controller. Delegated controllers' contact details are indicated in the event-specific data protection notice (DPN).

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

If the event is co-organised by REA and another European Institution, agency, body or other entity, they will act as joint controllers, exchanging information of the different data processed by each one. This joint controllership relation will be defined on a case-by-case basis in a separate agreement.

### 1.3. Name and contact details of processors (where applicable)

- DG HR and Security for visitor management in the context of Commission Physical Access Control System (PACS) [HR-DATA-PROTECTION-COORDINATOR@ec.europa.eu](mailto:HR-DATA-PROTECTION-COORDINATOR@ec.europa.eu)
- DG DIGIT for EU Survey (contact details): [DIGIT-EUSURVEY-SUPPORT@ec.europa.eu](mailto:DIGIT-EUSURVEY-SUPPORT@ec.europa.eu) (support team) and [DIGIT-D1@ec.europa.eu](mailto:DIGIT-D1@ec.europa.eu)
- DG DIGIT for EU Login (Director-General of DG DIGIT, Rue de la Loi 200, B-1040 Brussels)
- DG DIGIT for MyIntraComm (contact details) Head of Unit Internal Communication Unit HR.DDG.A.4: [HR-MAIL-A4@ec.europa.eu](mailto:HR-MAIL-A4@ec.europa.eu)
- DG COMM for EUROPA (contact details) COMM EUROPA MANAGEMENT: [MANAGEMENT@ec.europa.eu](mailto:MANAGEMENT@ec.europa.eu)

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

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

### 1.5. Purpose of the processing

The purpose of this processing operation is to collect and process personal data necessary for the following organisational aspects of the events related to grant management ("events" in the rest of this document) organised in a REA or EC building<sup>1</sup> (physical) and remotely (partially remote or fully digital):

- The coordination, organisation and management (including measures related to security and access to the building, for events which take place in a REA or EC building) of events, which may include participants who are external to REA;
- The activities linked to the organisation of the event, such as sending invitation emails; collection of contact information of participants (including speakers, moderators, etc.); sending follow-up emails,

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<sup>1</sup> In cases exceptionally taking place in an external venue, the controller will ensure that the service contract contains the pertinent data protection provisions to ensure that personal data are processed by the external contractor process on his/her behalf in compliance with the regulation and in line with this record.

etc.;

- The publication of minutes, reports, notices and proceedings on EUROPA and/or MyIntraComm in the framework of the REA operating activities;
- The communication activities linked to the event: taking of pictures, filming or streaming of groups of participants and organisers in order to be published in the context of the organisation and dissemination of the event and in the framework of REA's operating activities, on MyIntraComm, Europa and social media.

The following types of events are covered under the present record:

- Project review meetings/checks;
- Cluster events;
- Thematic monitoring events;
- Information days;
- Workshops;
- Policy feedback meetings with projects;
- Project conferences;
- Any other events related to REA core business of grants management.

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

- Council Regulation (EC) No 58/2003 laying down the statute for executive agencies;
- Commission Implementing Decision 2013/778/EU of 13 December 2013, establishing the Research Executive Agency and repealing Decision 2008/46/EC;
- The Commission Decision C(2013)9418 final of 20.12.2013 on delegating powers to the Research Executive Agency with a view to performance of tasks linked to the implementation of Union programmes in the field of research and innovation comprising, in particular, implementation of appropriations entered in the general budget of the Union;
- Horizon 2020 external communication strategy 2016-2020;
- REA Annual Work Programme;
- REA External Communication Workplan;
- REA Internal Communication Strategy 2017 and Beyond.

Article 5(1)(d) of the Regulation requires the data subject's explicit consent for the following specific purposes:

- Inclusion into the event's participants list, which is shared among the participants and authorised persons.
- Invitations to future similar events that REA may organise;
- For communication purposes: live web streaming, video recording and images of the speakers and the participants, published on the REA's MyIntraComm, the REA EUROPA website and on REA's Twitter account;
- (For speakers/moderators only) Publication of the name, picture, short CV provided by the speaker in the digital and paper materials about the event.

The participants have the right to withdraw their consent at any time, without affecting the lawfulness of the processing based their consent before its withdrawal.

## 1.7. Categories of data subjects

Categories of individuals whose data REA processes in the context of the organisation of the event:

- Authorised European Commission staff;
- Authorised European Union Institutions, agencies or bodies' staff;
- Individuals (natural persons), i) who are applicants/beneficiaries in Horizon 2020 proposals/grants or ii) who represent or act in a certain role on behalf of the legal entities participating to Horizon 2020 calls/grants;
- Individuals that participate as representatives of any other external stakeholders.

## 1.8. Categories of personal data

The personal data processed in the framework of the organisation of the event are:

- For the organisation of the event: contact details, i.e. title, first name, last name, signature, position/function, and email address.
- For access to building: identification data, i.e. date of birth, passport or identity card number, passport or identity card valid date and nationality.
- For communication purposes: live web streaming, images and video recordings of the participants (including speakers/moderators); images and video recordings of the event that may be published on REA's intranet or hosted on MyIntraComm (the Commission's intranet), the REA webpage on EUROPA and REA's Twitter account (non- mandatory);

Participation to the event is not conditioned by the data subjects' consent to appear on pictures and audio-visual material. Data subjects who disagree to appear on pictures and audio-visual material will be provided with a badge to wear visibly during the event so that they can be excluded from recording and/or capturing of images. For online events, data subjects will be able to switch off the camera and mute themselves.

- For accessibility or dietary purposes: sensitive data (mobility and special needs);
- For reimbursement needs: financial personal data may be collected (payment card number or bank account or other financial data).

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

As each type of event under this record is different in terms of organisation, participants, venue and scope, the specific details will be provided in the specific Data Protection Notice (DPN) as well as the retention time.

The retention time by category of personal data that is processed are the following:

- Contact details processed for the purpose of the organisation and management of the event will be deleted after the last action of this processing, except for those participants that have given their explicit consent to receive post-event information (minutes, abstracts, brochures, etc.), information about other events and/or receive the newsletter etc.
- Identification data processed for the purpose of access to the building (security clearance) and collected via EU pass or any other way will be deleted once this data has been transmitted to the European Commission DG HR Security Directorate as set up DPR-EC-00655. The Data retention is set to be until the termination of the link between the data subject and the Commission, plus 6 months and will vary based on the type of link (e.g.: external contractors: end of contract plus 6 months, visitor: end of visit plus 6 months, etc.);
- Personal data resulting from the picture and audio footage activity:
  - images and video recordings from events will be kept for up to 2 years after the event;
  - recordings from web-streamed and online events will be kept for up to 2 years before being

deleted.

- Personal data shared with external contractors for organisational purposes are retained during the period for the organisation of the event and will be erased by the external contractors in accordance with the corresponding contractual obligations and provisions.
- Sensitive data relating to dietary requirements and accessibility requirements will be collected via the EU survey tool. The data related to dietary and accessibility requirements will be anonymised<sup>2</sup> before being transferred to the external contractor. The data related to accessibility requirements will be retained up to 1 month after the end of the event.
- If the external contractor has collected directly these sensitive data, they will be requested to anonymise<sup>3</sup> them and erase them in accordance with the corresponding contractual obligations and provisions.

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

Within the Agency, the following recipients will have access to the personal data with different purposes:

- Authorised staff of REA Units responsible for the organisation and management of the event or;
- Authorised staff of the REA Communication sector may access content, pictures and audio-visual material for subsequent communication purposes after the event.

Outside the Agency the following possible recipients are:

- Event participants will receive the participants' list containing names, contact details position/function, and name of the organisation of those participants who have provided consent, if relevant to the event;
- Authorised European Commission staff or of other institutions, agencies or bodies co-organising the event if relevant for the purpose of the organisation of the event;
- Authorised European Commission staff for policy purposes;
- Staff in the DG HR Security Directorate for the access to the building;
- Staff of external contractors, if required for organisational purposes (such as event management organisations, catering services that may handle data relevant to meal/dietary preferences; travel agency that may handle travel/accommodation relevant data).
- Third-party platform providers authorised by DIGIT. (i.e.: Skype for business, Microsoft TEAMS, Webex and sli.do).

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

No transfer of personal data to a third country or to an international organisation is expected. However if this would happen, this will have to be done in accordance with the general principles for transfers<sup>4</sup>.

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<sup>2</sup> In exceptional cases, such as events with assigned seats, these data will not be anonymised automatically, but kept until the end of the event.

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<sup>4</sup> Chapter 5 of the EU regulation 2018/1725 and in compliance with Judgment Schrems II C-311/18 from 16 July 2020.

### **1.12. High-level description of security measures to ensure information security<sup>5</sup>**

In order to protect personal data of the individuals, REA 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 of the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

All personal data in electronic format (names, emails, images) are stored either on the servers of REA or of the European Commission, the operations of which abide by the European Commission's security decisions and provisions established by the Directorate of Security for these kind of servers and services. Access to data is granted only to the authorised persons mentioned above as recipients of the personal data. The external contractors (processors/sub-processors) are bound by specific contractual clauses for any processing operations of personal data on behalf of REA/the European Commission.

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

The Data Protection Notice (DPN) template includes the specific requirements for each type of event and is available under the REA Intranet (Section “Data Protection”). The DPN is created by the organiser and distributed to the data subjects (participants, moderators, speakers, etc.), and is attached to the invitation to the event including the relevant consent forms to fill in by the participants.

Each event-specific DPN contains the delegate controller’s contact information (organisers’ Unit functional mailbox) in order to deal with questions before, during and after the event.

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<sup>5</sup> All processing operations are carried out pursuant to Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.