



**RECORD OF PERSONAL DATA PROCESSING ON THE TRANSPARENCY REGISTER**

Art. 31 of the *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 (henceforth the Regulation"*)

**Record n°**

67

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*In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.*

*This record covers the following processes:*

- 1) Mandatory records under Art 31 of the data protection regulation*
- 2) Compliance check and risk screening*

*The ground for the record is (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.*

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<b>PART 1</b> <b>(This part is public)</b> <b>Name of the processing operation</b>		
<b>1</b>	<b>Creation and last update of this record (if applicable)</b>	NA, as this is a new record.
<b>2</b>	<b>Title and one-sentence description of the processing</b>	<p>The purpose of the processing is to publish the minutes of meetings held by REA managers (Director, Heads of Department, Heads of Unit) and other REA staff or of other European Institutions, bodies or agencies (EUIABs), if applicable, with interest representatives (organisations or self-employed individuals) on issues relating to decision-making and policy implementation at REA.</p> <p>Personal data of REA staff (names, service, user logs) is processed in ATMOS for the purpose of using the IT system and personal data of Commission staff (names, service, user logs) is processed in ATMOS for the purpose of managing the functioning of the IT system, in both cases the Commission is separated controller.</p>
<b>Part 1 - Article 31 Record</b>		
<b>2a</b>	<b>Legal basis</b>	<p>The processing of the personal data is based on:</p> <ul style="list-style-type: none"> <li>- Article 5(1)(a) of the Regulation: 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;</li> </ul> <p>(a2) including processing of personal data necessary for the management and functioning of the Union Institutions or bodies [Recital (22) of the Regulation];</p> <ul style="list-style-type: none"> <li>- Article 5(1)(b) of the Regulation: processing is necessary for compliance with a legal obligation to which the controller is subject;</li> </ul> <p>More specifically,</p> <ul style="list-style-type: none"> <li>- Article 11(1) and (2) of the Treaty on European Union (TEU) and Article 15(1) of the Treaty on the Functioning of the European Union (TFEU);</li> <li>- Commission Decision (EU) 2024/3082 of 4 December 2024 on transparency measures concerning meetings held between Commission staff holding management functions and interest representatives, and repealing Decision 2014/838/EU, Euratom, OJ L, 2024/3082;</li> </ul>
<b>3</b>	<b>Function and contact details of the controller</b>	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 to the delegated controller and is exercised by REA

		<p>Head of Department D – Coordination and Corporate Services.</p> <p>The data controller may be contacted via functional mailbox: <a href="mailto:REA-LEGAL@ec.europa.eu">REA-LEGAL@ec.europa.eu</a></p>
<b>4</b>	<b>Contact details of the Data Protection Officer (DPO)</b>	<a href="mailto:REA-DATA-PROTECTION-OFFICER@ec.europa.eu">REA-DATA-PROTECTION-OFFICER@ec.europa.eu</a>
<b>5</b>	<b>Name and contact details of joint controller (where applicable)</b>	N/A
<b>6</b>	<b>Name and contact details of processor (where applicable)</b>	N/A
<b>7</b>	<b>Purpose of the processing</b>	<p>The purpose of the processing is to make public certain information on meetings held by REA managers (Director, Heads of Department, Heads of Unit) with interest representatives (organisations or self-employed individuals) on issues relating to decision-making and policy implementation at REA.</p> <p>External participants self-register themselves in the Transparency Register, and REA publishes meeting information.</p> <p>Minutes are published via the ATMOS IT tool, including:</p> <ul style="list-style-type: none"> <li>• names and functions of participating REA managers, and European Union Institutions, Bodies and Agencies (hereinafter, EUIBA) staff with managerial or equivalent positions,</li> <li>• if applicable, the name of the interest representative organisation, and</li> <li>• discussion content and conclusions.</li> </ul> <p>Meeting information is processed in ATMOS and published on the REA webpage and in the Transparency Register profile of the interest representative. The Commission also provides downloadable datasets of REA meetings on <a href="http://data.europa.eu">data.europa.eu</a> in XML/Excel format.</p> <p>In addition, certain personal data of REA staff involved in encoding the minutes (names, e-mail, service, function, user logs) is processed in ATMOS for the purpose of using the IT system.</p> <p>Certain personal data of Commission staff is also processed in ATMOS for the purpose of managing the functioning of the IT. In both cases the Commission is separated controller.</p> <p>Further processing is foreseen for archiving in the public interest and statistical purposes.</p>

8	<b>Description of the categories of data subjects</b>	<ul style="list-style-type: none"> <li>• REA staff encoding information in ATMOS</li> <li>• REA staff participating in the meetings holding management positions,</li> <li>• Interest representatives (legal or natural persons as self-employed individuals as registered in the transparency register)</li> <li>• Any EUIBA staff in active position at managerial or equivalent level who participate in the meetings.</li> </ul>
9	<b>Description of personal data categories</b>	<p>Categories of personal data:</p> <p><input checked="" type="checkbox"/> Identification/career data:</p> <ul style="list-style-type: none"> <li>- Name, e-mail, service and user login of the REA staff encoding information in ATMOS.</li> <li>- Name(s) of the REA manager(s), service, function, and EUIBA staff at managerial or equivalent level, if applicable, participating in a meeting.</li> <li>- Name(s) of the Interest representatives (legal or natural persons as self-employed individuals as registered in the Transparency Register).</li> </ul> <p><input checked="" type="checkbox"/> Other data</p> <p>– The subject, content and conclusions of the meeting. Date, location and time of the meeting. Date and time of actions performed in ATMOS by the REA staff encoding information in ATMOS</p> <p><i>The list of categories of personal data is exhaustive, but not the examples given.</i></p>
10	<b>Retention time (time limit for keeping the personal data)</b>	<p>REA applies the principles and retention periods indicated in the Common Retention List of the Commission by analogy</p> <p>Personal data of the meeting participants (REA and EUIBA staff, where applicable, holding managerial or equivalent position, and where applicable, interest representatives) is retained for five-year period, starting from the date of the publication of the minutes.</p> <p>Personal data of the REA staff encoding information in ATMOS is retained for 5 years as of the date of the last logged action, unless a longer retention period is necessary due to a legal or administrative procedure</p> <p>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?</p> <p><input checked="" type="checkbox"/>yes</p>

		<p>For statistical purposes</p> <p>For archiving in the public interest: following the lapse of the applicable retention period, the Europa webpages are digitally archived for permanent preservation, in line with the Commission Europa Web Guide.</p>
11	<b>Recipients of the data</b>	<p>Only Commission IT staff managing the functioning of the IT system and the REA staff responsible for the encoding of meetings will have access to the personal data on a strict need-to-know basis.</p> <p>The lists of meetings held by REA managers with interest representatives are <a href="#">published online</a> and are therefore available to the general public (Europa.eu)</p> <p>The personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, the European Ombudsman or the European Court of Auditors.</p>
12	<b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b>	<p>Since the minutes are published on a publicly available website (europa.eu), personal data mentioned above are accessible worldwide.</p> <p>Data is transferred to countries outside the EU or EEA  <input checked="" type="checkbox"/>no</p> <p>Data is transferred to international organisation(s)  <input checked="" type="checkbox"/>no</p>
13	<b><u>General</u> description of the technical and organisational security measures</b>	<p>All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission.</p> <p>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.</p> <p>In order to protect personal data, 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 presented by 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.</p>

14	<b><u>Data subject rights/restrictions</u></b>	<p>A data subject can submit a request concerning access, rectification, erasure, restriction or objection to processing of their personal data to the Controller (Article 14(3) of Regulation (EU) 2018/1725) by sending their request to the Functional Mailbox <a href="mailto:REA-LEGAL@ec.europa.eu">REA-LEGAL@ec.europa.eu</a>.</p> <p>They may be restricted only under certain specific conditions as set out in the applicable <u>Restriction Decision</u> in accordance with Article 25 of Regulation (EU) 2018/1725 or due to confidentiality of the communications or a communication of a data breach</p> <p>Further to the above, data subjects may contact the REA Data Protection Officer (DPO): <a href="mailto:REA-DATA-PROTECTION-OFFICER@ec.europa.eu">REA-DATA-PROTECTION-OFFICER@ec.europa.eu</a></p> <p>In case of conflict, complaints can be addressed to the European Data Protection Supervisor: <a href="mailto:EDPS@edps.europa.eu">EDPS@edps.europa.eu</a></p>
15	<b>Information to data subjects/Data protection notice (DPN)</b>	<p>A Data Protection Notice (DPN) relevant to this data processing is available in the <u>REA public register of records</u> and it is transmitted by the data controller to the data subjects, where applicable.</p>