



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.

Record No: 43
Created on (date): 11 December 2019
Last update (date): 17 April 2020

NAME OF THE PROCESSING ACTIVITY

Personal data collection for subscription to the REA newsletter on the REA Europa webpage

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 the data controller is exercised by Ms Lara PASSANTE, Head of Sector Communication, Unit C1 (Administration). The controller may be contacted via the Agency's [contact form](#) on Europa.

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

Ms Maria Francisca BRUNET COMPANY (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)

Subscription to the REA newsletter is a functionality accessible via the Agency webpage on [Europa](#). The Europa domain belongs to the '.eu' top level domain established by Regulation EC 733/2002 and is managed by DG Communication Unit B3 'Europa Web Communication' (contact: Europamanagement@ec.europa.eu).

Since 2005, the Europa domain has been used by the EU institutions for their online communications and groups websites from all EU institutions.

The general Europa [privacy policy](#) is accessible to visitors via the REA webpage on [Europa](#).

Within the Europa web domain, DG CNECT manages the Newsroom project, which is the news management system used for the newsletter. Newsroom is developed and managed by DG CNECT Unit R3 'Knowledge Management and Innovative Systems' (contact: CNECT-NEWSROOM-SUPPORT@ec.europa.eu).

1.5. Purpose of the processing

Subscription to the Agency's newsletter is ensured via the submission of an online registration form through the REA Europa webpage. Upon submission of the online registration form and provision of consent by the data subject, the latter is automatically included in the REA stakeholders database. The purpose of this processing activity is to send regular newsletters to subscribers via email with updates on topics they have selected on funding opportunities, events and other activities related to the programmes managed by the Agency. The personal data are not used for an automated decision-making, including profiling.

Inclusion in the REA stakeholders database can be done only through the online registration form and with the provision of consent by the data subjects. Manual inclusion in the database is not possible.

Data subjects can unsubscribe from the newsletter at any time, by a one-click feature located at the bottom of the newsletter.

1.6. Legal basis for the processing

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

1.7. Categories of data subjects

Any person who registers via the REA Europa webpage to receive the newsletters.

1.8. Categories of personal data

- Newsletter Registration Form - mandatory data:

First name, last name, email address, country of residence, organisation, current or past EU funds beneficiary (yes/no), how was the information about the newsletter found (with multiple choices: EU event, NCP, REA website, etc.).

- Newsletter Registration Form - non-mandatory data:

If the question above on whether the data subject is a current or past EU funds beneficiary is 'yes', the data subject can provide additional information on the following points: the programme, acronym, project number, position and website.

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

Personal data are preserved until the data subjects unsubscribe from the service.

Is any further processing for historical, statistical or scientific purposes envisaged?
Yes.

Data are also processed for statistical purposes to monitor trends in subscriptions to the REA newsletter and assess its effectiveness as a channel to reach out to REA stakeholders. The data gathered and related analysis do not allow to identify the data subjects and are not published.

Personal data are automatically deleted from the database upon unsubscription by the data subjects from the service. After the automatic deletion, the personal data are no longer available. There are no local copies of the database.

1.10. Recipients of the data

Who has access to the data within the Agency:

- Authorised staff of the REA Communication sector.

Who has access to the data outside of the Agency:

- DG COMM Unit B3 'Europa Web Communication' and DG CNECT Unit R3 'Knowledge Management and Innovative Systems' as processors for Europa and the news management system Newsroom.

The access is restricted to the information necessary for the legitimate performance of tasks within the competence of the recipient (controller and processor). The recipients of the data are reminded of their obligation not to use the data received for other purposes than the one for which they were transmitted.

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 on the REA Europa webpage in the submission form for subscribing to the newsletter and on the REA Intranet (section “Data Protection”).

2. COMPLIANCE CHECK

(INTERNAL USE ONLY – NOT TO BE PUBLISHED)

2.1. Description of the processing activity

The description of the processing activity is broken down in two sections, covering first the processing activity related to the general browsing experience of users on the REA webpage on [Europa](#), and next the processing activity related to the newsletter subscription when users reach the related section.

REA webpage on Europa

Every time users visit webpages on the Europa domain, they are prompted to accept or refuse first-party and third-party [cookies](#).

First-party cookies are set by the website. Only that website can read them. The purpose is to enable the site to remember users preferences (such as user name, language, etc.) for a certain period of time (until the browser is closed), make the website operational (operational, authentication and technical cookies) and gather analytics (analytics cookies). The analytics cookies do not collect any personal information but assess how the user interacts with the website. These cookies are stored for longer (13 months) and are used solely for internal research on how to improve the service provided. The data collected by the cookies are not shared with any third parties or used for any other purpose.

Since the implementation of the cookie consent kit on the REA webpage (July 2019), users are informed about the use of the above first-party cookies through a banner that provides the link to the [cookies](#) section where detailed explanation is provided on purposes and retention time. The banner prompts the users to accept or refuse cookies. The banner disappears if the user has indicated a choice. The user's choice is saved in a cookie in the .europa.eu domain until the browser is closed so that this information can be passed to the next Europa site s/he visits. As indicated above, first-party analytics cookies are stored for longer. This is clearly explained in the [cookies](#) section relayed by the banner on the REA webpage.

Third-party cookies are linked to embedded videos and other iframe content from a third party e.g. Youtube, Vimeo, Facebook. To view this third-party content, the user first has to accept their specific terms and conditions. This includes their cookie policies.

Since the implementation of the cookie consent kit on the REA webpage (July 2019), the user can accept or refuse the terms and conditions of the third party. The user is also offered the possibility to remember his/her choice. In this case, the choice of the user concerning the terms and conditions of the third party is saved in a first-party cookie managed by the .europa.eu domain until the browser is closed. This is clearly explained in the [cookies](#) section relayed by the banner.

Subscription to REA newsletter

In order for a user (potential or present REA stakeholder) to subscribe to the REA newsletter, s/he must complete the corresponding form on the REA webpage and provide his/her consent by ticking the checkbox 'I have read and agree with the specific privacy statement'. A hyperlink located next the checkbox provides the text of the data protection notice based on the current record. It is technically not possible for the user to submit the registration form if the checkbox is not ticked.

The personal data entered in the registration form are transmitted via a secure/encrypted environment (https) to a Commission database, which can be accessed by the authorised staff in DG CNECT (processor for the Newsroom news management system) and the authorised staff of the REA Communication sector (controller).

2.2. Lawfulness of the processing activity

The data subject has given consent to the processing of his or her personal data for one or more specific purposes (Article 5(1)(d) of Regulation).

2.3. Definition/scope of the purpose of processing

Did you list all purposes under section 1.5? **Yes**

Are the purposes specified, explicit, and legitimate? **Yes**

Where information is also processed for other purposes, are you sure that these are compatible with the initial purpose(s)? **Yes**

2.4. Data minimisation

Do you really need all data items you plan to collect? **Yes**

Are there any you could do without? **No**

2.5. Data Accuracy

The personal data are collected directly from the data subjects. Data subjects may request the data controller the rectification of incorrect or incomplete data by contacting the controller via the Agency's [contact form](#) on Europa.

2.6. Storage limitation

Personal data are preserved in the database until the data subjects unsubscribe from the service. There are no local copies of the database.

2.7. Transfers of personal data to third countries or international organisations

Not applicable.

2.8. Measures to ensure security of processing

Organisational measures

Organisational measures are based on appropriate access rights and access control precautions. More specifically, the data controller grants access to the personal data only to authorised members of the REA Communication sector by sending a request to the data processor in charge of the news management system Newsroom (DG CNECT). Access is granted only if there is a clearly specified administrative purpose and only to those staff members, whose role and level of responsibility require them to have access. Hence, access to personal data is granted on a need to know basis.

Technical measures

All the data received through the online form is stored on the servers of the European Commission or of the REA, the operations of which abide by the Commission's security decisions and provisions established by the Directorate of Security for these kinds of servers and services.

The transmission of data is done in a secure/encrypted environment (https).

2.9. Transparency: How do you inform people about the processing?

Data subjects are informed about the use of cookies by the REA webpage on Europa via a banner located at the top of the page upon the first visit within a browsing session. Data subjects have the possibility to accept or refuse the cookies, as explained under section 2.1 of the present record.

When data subjects reach the section containing the registration form, a dedicated data protection notice informs them of the processing of their personal data for the subscription to the REA newsletter.

It is technically not possible for data subjects to submit the registration form without ticking the checkbox 'I have read and agree with the specific privacy statement'.

Part 1 of this Record and the corresponding Data Protection Notice are published on the REA Europa webpage and the REA Intranet (Section "Data Protection").

Access (and/or restriction of access) and other rights of persons whose data you process

Personal data are automatically deleted from the database as soon as the data subjects unsubscribe from the service. There are no local copies of the database.

Furthermore, data subjects may have access to their personal data and may exercise their right of access / rectification / erasure / restriction / data portability / objection / withdrawal of consent (where applicable) by contacting the controller via the Agency's [contact form](#) on Europa.

Further to the above, the data subjects can contact the REA Data Protection Officer (DPO): REA-DATA-PROTECTION-OFFICER@ec.europa.eu

In case of conflict, complaints can be addressed to the European Data Protection Supervisor: EDPS@edps.europa

3. RISK SCREENING (THRESHOLD ASSESSMENT / CRITERIA)

(INTERNAL USE ONLY – NOT TO BE PUBLISHED)

3.1. Is the processing activity included in the EDPS' positive list? No

3.2. Does the processing involve any of the following?

3.2.1 Systematic and extensive evaluation of personal aspects or scoring, including profiling and predicting **No**

3.2.2 Automated-decision making with legal or similar significant effect: processing that aims at taking decisions on data subjects **No**

3.2.3 Systematic monitoring: processing used to observe, monitor or control data subjects, especially in publicly accessible spaces **No**

This may cover video-surveillance but also other monitoring, e.g. of staff internet use.

3.2.4 Sensitive data: data revealing ethnic or racial origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic data, biometric data for identification purposes, data concerning health or sex life or sexual orientation, criminal convictions or offences and related security measures or otherwise considered sensitive **No**

3.2.5 Data processed on a large scale, whether based on number of people concerned and/or amount of data processed about each of them and/or permanence and/or geographical coverage **No**

3.2.6 Datasets matched or combined from different data processing activities performed for different purposes and/or by different data controllers in a way that would exceed the reasonable expectations of the data subject **No**

3.2.7 Data concerning vulnerable data subjects: situations where an imbalance in the relationship between the position of the data subject and the controller can be identified **No**

3.2.8 Innovative use or applying technological or organisational solutions that can involve novel forms of data collection and usage. Indeed, the personal and social consequences of the deployment of a new technology may be unknown **No**

3.2.9 Preventing data subjects from exercising a right or using a service or a contract **No**

3.2.10 Transfer of personal data outside EU without legislative basis **No**

3.3 Conclusions

3.3.1 Number of "Yes" ticked under Part: **None**

3.3.2 Assessment

The occurrence of an event resulting in a risk to data subjects' rights and freedoms is very unlikely.

4. DATA PROTECTION OFFICER (DPO) CONSULTATION ON RISK SCREENING (Section 3)

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4.1. Is the processing of personal data on a positive or negative list of the EDPS?

No

4.2. Is it on the list of the EC for prior consultation?

No

4.3. Has a DPIA already been carried out in the context of the adoption of a legal act?

Not applicable.

4.4. DPO advise

The DPO acknowledges the controller's analysis and conclusions referenced in section 3

5. LINKED DOCUMENTATION

(INTERNAL USE ONLY – NOT TO BE PUBLISHED)

5.1. (Where applicable) links to threshold assessment and DPIA

Not applicable.

5.2. Where are your information security measures documented?

The REA is implementing by analogy the general policy on IT security and related provisions of the European Commission. Relevant documentation can be found under the section "Security" of the REA Intranet.

5.3. Other linked documentation

[Europa Web Guide](#)

[Cookies policy on Europa](#)

The news management system [Newsroom](#)