



## **PROTECTION OF YOUR PERSONAL DATA**

This privacy statement provides information about the processing and the protection of your personal data when using (S-)CIRCABC.

Version 1.1, 05<sup>th</sup> April 2024

**Processing operation:** (S-)CIRCABC

**Data Controller:** The European Commission (or the 'Commission')

**Record reference:** DPR-EC-01666

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## **Introduction**

The European Commission (hereafter the 'Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) N° 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 reason 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.

The information in relation to the processing operations via the (S-)CIRCABC application undertaken by the Commission are presented below i.e. this privacy statement explains how your personal data is handled when you register as a user in (S-)CIRCABC undertaken by DIGIT D.1. It does not cover the data protection aspects linked to the Interest Groups you belong to. For this, please check with your Group Leader.

## **1. WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA?**

### **1.1 Non-registered users**

The (S-)CIRCABC platform can be visited by any user. For all visitors, including these non-registered users, the platform is collecting IP addresses for technical purpose, which are essential for the operation of the website. If non-registered users provide consent to the processing of their personal data for statistical purpose, the controller processes their personal data via cookies. These data and cookies processed by the systems Europa Analytics enable the data controller to collect information that is used to prepare aggregated, anonymous statistics reports of visitors' activity.

### **1.2 Personal data (of registered users) collected for user management**

Purpose of the processing operations: The Commission, through (S-)CIRCABC, collects and uses your personal information for the purpose of enabling you, as a user, to connect to the (S-)CIRCABC application and use the service for accessing interest groups for sharing information and resources. Your contact details (email address, first name and last name) may also be used for contacting you.

Your personal data will not be used for an automated decision-making including profiling.

### **1.3 Personal data collected via interest groups**

Please note that the Commission is not responsible for the privacy policies or practices carried out by the people or organisations using the (S-)CIRCABC application and service to create and manage an interest group. All personal data collected within interest groups will be processed by and under the responsibility of the Group Leader or Group Leader's organisation.

**Individuals and organisations using (S-)CIRCABC to create and manage interest groups that collect personal data have the legal obligation to create and publish their own privacy statement.**

## **2. ON WHAT LEGAL GROUND(S) DO WE PROCESS YOUR PERSONAL DATA**

We process your personal data, because:

- '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.'
- 'the data subject has given consent to the processing of his or her personal data for one or more specific purposes.'

### **For Commission users:**

(S-)CIRCABC is based on Decision 2004/387/EC, Article 5, paragraph 2 and Annex II, section B, point (p). The processing is also necessary with a view to complying with Article 33.1 (a) (b) and (c) of the Regulation 2018/1046 that refers to the performance and principles of economy, efficiency and effectiveness.

In addition, the processing of personal data can also be carried out for the performance of tasks carried out in the public interest by the Union institutions and bodies that is necessary for the management and functioning of those institutions and bodies.

**For non-Commission users:**

Data subjects have/will give(n) the aforementioned consent by accepting the present privacy statement. Accepting this privacy statement is required before entering the application and using the service. Data subjects may withdraw their consent at any time by contacting the Data Controller.

You may exercise your right to withdraw your consent at any time by directly contacting the Data Controller using the email in paragraph 8.1.

### **3. WHICH PERSONAL DATA DO WE COLLECT AND FURTHER PROCESS?**

In order to provide the (S-)CIRCABC services, through the processing operations, the Commission collects the following categories of personal data:

#### **3.1 Credentials**

To be identified by the system, the user needs a valid login / password, which is managed by the EULogin<sup>1</sup> service. For further information on how EULogin is processing your personal data, please refer to the EU Login privacy statement.

#### **3.2 User data**

Some personal data are accessible from the (S-)CIRCABC application:

- Identity (mandatory information): username, first name, last name, email address.
- Contact information (optional): title, organisation, phone number, postal address, fax, URL address, open text field/Description.

Full name and Email address are data retrieved by an automatic process from EULogin and the European Commission's Central User Database, which is stored at the Data Centre of the European Commission. The Data Centre of the European Commission is bound to comply with Regulation (EU) N° 2018/1725 and with any Commission's security decision and provision established by the Directorate General of Security and Human Resources for this kind of servers and services (Decision 2017/46)

#### **3.3 Europa Analytics**

[Europa Analytics](#) is the corporate service that monitors and evaluates the effectiveness and efficiency of the European Commission's websites on Europa. Europa Analytics is based on the open source analytics platform 'Matomo' and is installed on a webserver. Both the infrastructure and software are under the full control of the European Commission and comply with the current EU data protection legislation.

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<sup>1</sup> EULogin is the Authentication Service of the European Institutions based on SSO (Single-Sign On) technology DPR-EC-03187.

(S-)CIRCABC is using Europa Analytics for traffic statistics and analytics. You can find more information on the Data Protection Information and measures, the 'do not track' preference and other information on the Europa Analytics website.

#### **4. HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

The Commission only keeps your personal data only for the time necessary i.e. as long as the interest groups you belong to are still activated by the interest group manager/creator.

##### **4.1 EU staff member (internal user)**

As long as you are an EU staff member, your user account remains active and your personal data is therefore retained. However, you can, at any time, ask the (S-)CIRCABC team to terminate your account if you no longer wish to use the service. In this case, your user account and all associated data will be permanently deleted.

##### **4.2 (S-)CIRCABC external user**

As an external user, you can, at any time, ask the (S-)CIRCABC team to terminate your account if you no longer wish to use the service. The corresponding account and all associated data will be permanently deleted.

In addition, in the case of an external user which does not belong to any active group (a group with no activity for 5 years becomes inactive), the user account is deleted after one year.

#### **5. HOW DO WE PROTECT AND SAFEGUARD YOUR PERSONAL DATA?**

All personal data are stored on the servers of the European Commission's Data Centre. 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.

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 the personal data solely to authorised persons with a legitimate need to know for the purposes of the processing operations.

The security of your personal data is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use means to protect your personal data, we cannot guarantee its absolute security.

## **6. WHO HAS ACCESS TO YOUR PERSONAL DATA AND TO WHOM IS IT DISCLOSED?**

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operations and to authorised staff according to the 'need to know' principle. Such staff abide by statutory requirements if needed.

This includes:

- The infrastructure administrators.
- (S-)CIRCABC administrators: administer every category of Group.
- EC Category administrators: administer (create, manage, delete) Groups set in their category. Typically, at the European Commission, there is one category per DG or agency. They may grant or revoke membership of any interest group in their category.

In addition, the following (S-)CIRCABC Interest group roles:

- Group Leaders: they manage documents and users in their groups. They may grant or revoke membership; they may contact users for purposes of their service.
- Member managers: they only administer the directory service of their interest group. They grant or revoke membership. They may modify members' access rights in the interest group.

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.

The Commission will not share user personal data with third parties for direct marketing. In other words, the Commission will not use your personal data to contact you with newsletters, marketing or promotional information. However, we may use your email address to contact you with information or updates regarding (S-)CIRCABC.

## **7. 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, in particular the right to access your personal data, and, to rectify them, in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You can exercise your rights by contacting the Data Controller, or, in case of conflict, the Data Protection Officer.

Please note that your first name, last name and email address are collected from EULogin and can only be modified there. (S-)CIRCABC is automatically updated according to EULogin data (see Record DPR-EC-03187). At first login, your account is automatically created using data extracted from the EULogin database. Other personal data can be modified from the (S-)CIRCABC Members page.

This Privacy Statement will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on the (S-)

CIRCABC application and accepted by the user. In case of any changes to this Privacy Statement, we will notify you by placing a prominent acceptance message on the (S-)CIRCABC application immediately after the login. You will be requested to read and accept the new Privacy Statement.

## **8. CONTACT INFORMATION**

### **8.1. 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 data controller:

[DIGIT-CIRCABC-SUPPORT@ec.europa.eu](mailto:DIGIT-CIRCABC-SUPPORT@ec.europa.eu)

You have the possibility to contact the (S-)CIRCABC support team in order to permanently delete your account in case you no longer need to use (S-)CIRCABC.

### **8.2. The Data Protection Officer (DPO) of the Commission**

You may also contact the Commission's Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **8.3. 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](mailto: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.

The European Data Protection Supervisor is acting as an independent supervisory authority. The EDPS makes sure that all EU institutions and bodies respect people's right to privacy when processing their personal data.

## **9. 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-01666**