

# CIRCABC Privacy statement

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## *Privacy statement on the protection of personal data*

### I. Introduction

- CIRCABC, as an application developed by the Commission of the European Union, is committed to user privacy. The policy on protection of individuals with regard to the processing of personal data by the Community institutions is based on *Regulation (EC) N° 45/2001 of the European Parliament and of the Council of 18 December 2000*.<sup>1</sup>

*Article 27 of the Regulation ("Prior-Checking by the EDPS") is not applicable.*

- CIRCABC (Communication and Information Resource Centre for Administrations, Businesses and Citizens) provides a web-based application that is used to create collaborative workspaces. It is divided into categories and Interest groups allowing people to manage content, users and communication features. Users personal data is collected in order to manage access rights and for purposes of the Service.
- Some CIRCABC pages may contain links to other websites. CIRCABC is not responsible for the privacy policies or practices of third party websites.

### II. Why do we collect, store and process your data?

We collect and process your personal information for these purposes:

- Provide you with membership of interest groups (IGs)
- Manage your access rights within an IG or a category of IGs
- Invite you to participate in events or meetings relating to the interest groups where you have membership\*
- Enable you to:
  - read or post discussion items in a thread developed within your IG \*
  - upload documents to the library of your interest group\*
  - read documents in your favourite language\*
- Send you notifications about what is new in your IG (uploads; items on a thread; etc.)\*
- Solve the incidents you might experience while using CIRCABC

\* NB: *being able to perform these actions depends on your access rights*

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<sup>1</sup> Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data

Collected personal data is treated according to the policy described in the above-mentioned regulation. The tasks related to CIRCABC are carried out in the public interest. No processing operations on personal data falling under *article 27 "Prior-Checking by the EDPS"* are applicable.

### **III. Who is responsible for the processing of your data? (Controller)**

Your data is processed under the responsibility of the Head of Unit of DIGIT.A3, Directorate-General for Informatics (DIGIT) of the European Commission.

The DIGIT's Data Protection Coordinator ensures that the provisions of the above-mentioned regulation are applied within DIGIT.

The [European Data Protection Supervisor](#) (EDPS) 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.

### **IV. What personal data do we collect?**

This statement only covers the corporate service dimension of CIRCABC. CIRCABC will process the personal data only for the purposes for which they were transmitted (see above, section II).

#### **Identity:**

ECAS, the EC's Authentication Service, is managing the authentication to CIRCABC. For further information on how ECAS is processing your personal data, please, read the ECAS own privacy statement.

In order to manage users' access rights, CIRCABC stores

- the ECAS unique identifier
- the username
- the first and last name
- the email address

of any user having logged in at least once.

These data are retrieved by an automatic process from ECAS 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 (EC) N° 45/2001 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.

N.B.: No identity information is collected by CIRCABC if you have no ECAS account and you consult interest groups via public access (without being logged in).

### Other personal data:

In addition to the personal data processed by the CIRCABC service, you might want to provide additional information. The optional contact area allows you to mention the following properties:

- Title
- Organisation
- Phone
- Postal address
- Description
- Fax
- URL address

CIRCABC also stores the language(s) you have chosen for

- The user interface
- The display of multilingual documents

### Cookies:

CIRCABC uses session "cookies" in order to ensure communication between the client-computer and the server. The cookies disappear once the session has been terminated.

## V. Whom are your data disclosed to?

The staff carrying out the processing of your information, and dealing with CIRCABC have access to your personal data. This includes:

- The CIRCABC team for purposes of support and maintenance
- The interest group administrators (leaders) and directory administrators in order to manage your memberships or your subscription to the notification service of your interest group
- The library, newsgroups and event administrators of your interest group may have access to your identity information (login, first name, last name) in order to carry out administration tasks (grant you access to confidential folders or documents when necessary; add you to a discussion thread; invite you to participate in a meeting of your community of users; etc.)

N.B.: Be informed that the interest group administrators may provide visibility of their membership list to your fellow-members or to users outside the interest group. This is under their only responsibility.

You may hide your contact information in CIRCABC (see section VII below)

The CIRCABC team does not transmit any data to parties which are outside the above-listed recipients and the legal framework mentioned, without prejudice to a possible transmission to the bodies in charge of an inspection task in accordance with Community legislation, e.g. OLAF, or an investigating magistrate.

The CIRCABC team will not share personal data with third parties for direct marketing.

## VI. For how long are your data kept?

- Your data will remain as long as the CIRCABC service will be operational. They can be removed from CIRCABC on your request.
- The cookies disappear once the session has been terminated.

## VII. How can you access your data, check their accuracy and correct them?

You can access and check your identity and contact information as well as your language options on the "My account" page of CIRCABC.

N.B.: **Your first name, last name and email should be corrected in ECAS.** On your first login after any modification has been made in ECAS, CIRCABC is automatically updated according to ECAS. The other personal data can be modified on the "My account" page of CIRCABC.

If you experience any difficulty with the update of your personal information, you can contact the CIRCABC support team by clicking on the "Contact" tab which can be found at top of every CIRCABC page.

## VIII. Who are the points of contact for your questions or complaints?

If you have concerns about the processing of your personal information in CIRCABC, feel free to contact the Head of Unit of DIGIT.A.3 for the processing of these data:

Contact by e-mail:

[DIGIT-A3@ec.europa.eu](mailto:DIGIT-A3@ec.europa.eu)

## IX. Recourse

Complaints, in case of conflict, can be addressed

- to the [data-protection-officer of the European Commission](#):

Contact by e-mail:

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

- to the [European Data Protection Supervisor](#):

Contact by e-mail:

[edps@edps.europa.eu](mailto:edps@edps.europa.eu)