



EUROPEAN COMMISSION

## **DATA PROTECTION NOTICE**

### **Processing activity:**

*Publication of meetings held with interest representatives and mission expenses*

### **Data Controller:**

*Secretariat-General, Unit A3 'Transparency & Ethics'*

**Record reference:** *DPR-EC-02047*

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## **1. Introduction**

The European Commission is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council<sup>1</sup>.

This data protection notice explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of that personal data, 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 controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

## **2. Why and how do we process your personal data?**

Purpose of the processing: On grounds of transparency, the Commission makes public

- information on meetings held by Commission representatives - Members of the Commission (Commissioners), their members of Cabinet and Commission staff holding management functions - with interest representatives, including minutes of such meetings
- an overview of mission expenses for Commissioners.

The Commission processes personal data within the meaning of point (3) of Article 3 of Regulation (EU) 2018/1725 in order to fulfil its above transparency obligations. The types of personal data processed is described in heading 4 of this notice.

The controller as well as Commission staff process the personal data for the specified publication purposes.

The information on meetings and mission expenses is processed in the dedicated Commission IT system (ATMOS).

Information on meetings with interest representatives is published on the official website of the Commissioner and/or of the Commission department (Directorate-General or service department) or executive agency concerned. It is also published as a list in the registration of the interest representative concerned in the [Transparency Register](#) established by the applicable Interinstitutional Agreement of 20 May 2021 ([OJ L 207, 11.6.2021, p. 1](#)). The Commission makes further available on [Data.europa.eu](#) datasets that enable the public to download the lists of Commission meetings with interest representatives in machine-readable XML and/or Excel format.

Minutes of meetings held with interest representatives are published on the official website of the Commissioner and/or Commission department (Directorate-General or service department) or executive agency concerned.

The information on mission expenses is published on the official website of the Commissioner concerned.

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.

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<sup>1</sup> 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, OJ L 295, 21.11.2018, p. 39.

The personal data is not used for any automated decision-making including profiling.

### **3. On what legal ground(s) do we process your personal data?**

We process your personal data because such processing is necessary for the performance of a task carried out in the public interest / in the exercise of official authority vested in the Commission, in accordance with point (a) of Article 5(1) of Regulation (EU) 2018/1725.

The Union law that is the basis for that processing is:

- 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)
- Commission Decision (EU) 2024/3081 of 4 December 2024 on transparency measures concerning meetings held between Members of the Commission and interest representatives, and repealing Decision 2014/839/EU, Euratom ([OJ L, 2024/3081, 5.12.2024](#))
- 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, 5.12.2024](#))
- Commission Decision of 31 January 2018 on a Code of Conduct for the Members of the European Commission ([OJ C 65, 21.2.2018, p. 7](#)), and in particular Articles 6(2) and 7(1) thereof.

### **4. Which personal data do we collect and further process?**

The processing concerns the following categories of personal data:

#### Publication of information on meetings held with interest representatives:

- Name of the Commissioner and/or Cabinet member(s)
- Name and function of Commission staff holding management functions
- Name of a self-employed individual (when registered as such in the Transparency Register)
- Date, location and subject matter of the meeting.

The data for the field ‘Name of the interest representative(s)’ is retrieved from the Transparency Register (record of processing activity published under reference [DPR-EC-00069 ‘Transparency Register’](#)). Unless this concerns the name of a self-employed individual registered as such in the Transparency Register, the name of the interest representative concerns organisations and does not involve personal data.

#### Publication of minutes of meetings held with interest representatives:

- Name of the Commissioner and/or Cabinet member(s)
- Name and function of Commission staff holding management functions
- Name of a self-employed individual (when registered as such in the Transparency Register)
- Date, location and subject matter of the meeting, main points raised and positions expressed at the meeting, and conclusions from the meeting, where applicable.

As with the information on meetings, the name of the interest representative concerns a natural person only in the circumstances that a self-employed individual is registered as such in

the Transparency Register. Otherwise, the name of the interest representative concerns organisations and does not involve personal data.

The publication of information on and minutes of meetings does not involve the processing of personal data other than the above. In accordance with Article 7 of Commission Decision (EU) 2024/3081 and Article 8 of Commission Decision (EU) 2024/3082, the personal data of individuals (acting on behalf of interest representatives) or Commission staff (other than members of the Cabinets and Commission staff holding management functions) attending meetings shall not be made public. Therefore, such personal data is not subject to processing for purposes of this activity.

Publication of information on mission expenses:

- Name of the Commissioner to which the mission costs relate
- Location, date and purpose of the mission, daily allowances, travel costs, accommodation costs, miscellaneous costs.

That information is extracted from the missions integrated processing system (MIPS) published under record of processing [DPR-EC-00990](#) 'Gestion des missions et des déplacements professionnels, y inclus du système MIPS (Mission Processing System), OBT (Online Booking Tool) et des contrats Agence(s) de voyages, Assistance et Assurance mission et Carte de crédit professionnelle'. In addition, ATMOS includes further information on the context of the mission, for example the types of meetings held or events attended during the mission, relevant links to Commissioners' social media accounts and press releases and the names and/or functions of individuals met during the mission (usually public figures acting in a public capacity).

Use/ management of the functioning of the ATMOS IT system:

- Identification data of Commission staff with access rights (Name, user login, email address, Commission service)
- Date and time of logged actions.

**5. How long do we keep your personal data?**

Personal data of Commission representatives and, where applicable, interest representatives concerned by the publication rules are kept in the ATMOS IT database and on Europa webpages for the entire duration of a Commission's mandate (5 years). At the end of this period, the personal data published on Europa webpages are stored on the long term for archiving purposes in the public interest, in line with the Commission [Europa Web Guide](#).

After the end of a Commission's mandate, ATMOS data is kept for an indefinite period to support content preserved in digital web archive. This is a technical process aimed to ensure that the historical information on meetings and missions of previous Commission mandates is still publicly available on the (archived) Europa webpages. Access to the information in ATMOS itself is subject to appropriate technical and organisational measures (access to the information pertaining to the outgoing Commission in the system is strictly password-protected and limited to the staff assigned to working on the database).

Personal data of Commission staff using or managing the functioning of the IT system (user logs) are automatically deleted after 3 months from the date of last logged action.

**6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the Commission. 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.

The Commission has put in place a number of technical and organisational measures to protect personal data. 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 activity.

#### **7. Who has access to your personal data and to whom is it disclosed?**

Information on and minutes of meetings held by Commissioners, their Cabinet members and Commission staff holding management functions with interest representatives, as well as the mission expenses per Commissioner, are published online and are therefore available to the general public.

Commission IT staff managing the functioning of the ATMOS IT system, with direct access rights to it, has access to the personal data therein. Commission staff using the IT system has access only to action logs concerning mission costs.

#### **8. 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. Under certain conditions, 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.

Insofar the right to object to the processing of your personal data is concerned, the exercise of that right has to be based on grounds relating to your particular situation.

You can exercise your rights by contacting the controller, or the Data Protection Officer of the Commission. You can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Upon request to exercise any of your above-mentioned rights, you will be provided with information within one month of receipt of your request. That period may be extended by two further months where necessary, taking into account the complexity and number of requests.

#### **9. Contact information**

##### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, if you have comments, questions or concerns, or if you would like to submit a complaint regarding the processing of your personal data, please contact the controller, Secretariat-General, Unit A.3 'Transparency & Ethics' at: [SG-ATMOS@ec.europa.eu](mailto:SG-ATMOS@ec.europa.eu).

- **The Data Protection Officer of the Commission**

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

- **The European Data Protection Supervisor**

You have the right to have recourse, i.e. you can lodge a complaint to the European Data Protection Supervisor via [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.

**10. Where to find more detailed information?**

The Commission Data Protection Officer publishes the register of all processing activities in the Commission. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing activity has been included in the Data Protection Officer's public register with the following Record reference: [DPR-EC-02047](#).