## **EUROPEAN COMMISSION**

# **PROTECTION OF YOUR PERSONAL DATA**

This privacy statement provides information about the processing and the protection of your personal data.

**Processing operation:** Management of the EU inter-institutional media accreditation

Data Controller: Directorate-General for Communication, Spokespersons' Service

Record reference: DPR-EC-00079.3

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## 1. Introduction

The European Commission (hereafter 'the Commission') is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reasons 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.

This privacy statement concerns the processing of personal data by the Commission when handling requests for media accreditation submitted via the JournaList e-registration form, undertaken by the Spokespersons' Service of the Directorate-General for Communication (SPP, the horizontal Data Controller on behalf of the Commission) and by the units responsible for dealing with processing activities related to the media accreditation in the competent Commission department or service.

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

The <u>purpose of the processing operation</u> is to facilitate and to regulate access to the EU institutions' premises for journalists. The accreditation is granted to media representatives for the purpose of parliamentary and political reporting as well as for the explanation of political activities of the EU institutions.

More specifically, the processing of personal data is necessary for:

- filing an online request for media accreditation;
- verifying and managing submitted applications;
- evaluating selection and/or eligibility criteria;
- managing the accreditation database and EU JournaList directory;
- communication activities such as: exchange of correspondence, sending e-mails and newsletters, notifications, invitations and follow-up (this entails the management of a directory and mailing lists);
- security verification by HR.DS, control of access to Commission premises and issuing of access cards;
- withdrawing accreditation;
- providing access to the EU JournaList directory for the Permanent Representations of the EU Member States to the EU for communication purposes (based on the journalists' consent), and creating logs on the use of the directory by the Permanent Representations.

Your personal data is being processed for the purpose of handling requests for media accreditation to EU institutions submitted via the JournaList e-registration form and the processing activities related to the accreditation procedure.

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

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

We process your personal data, because:

1) processing is necessary for the performance of a task carried out in the <u>public interest</u> or in the exercise of official authority vested in the Union institution or body (Article 5(1)(a) of Regulation (EU) 2018/1725)

The processing of personal data is necessary to carry out the accreditation procedure enabling media representatives to follow-up on activities of the European institutions.

In accordance with a general objective of the promotion of EU values under Article 13 TEU as well as the openness, transparency and accessibility obligations laid down by Article 15 TFEU, EU institutions shall conduct their work as openly as possible.

Informing citizens about the activities of the Union fosters democratic debate and contributes to the participation of citizens in the Union's decision-making process as well as increasing the visibility of the Union's contribution for citizens.

Such objectives can be achieved particularly through the press, which plays an essential role in reporting on the political activities of the EU institutions and in raising awareness among the citizens about their individual rights and freedoms under Union law.

2) processing is necessary for compliance with a <u>legal obligation</u> to which the controller is subject (Article 5(1)(b) of Regulation (EU) 2018/1725)

The processing of personal data is necessary for the maintenance of internal security and the functioning of the Commission as prescribed by Commission Decision 2015/443 on Security in the Commission (L72 17/03/2015) and in accordance with Commission Decision 2019/236 laying down internal rules concerning the provision of information to data subjects and the restriction of certain of their rights in the context of the processing of personal data by the European Commission for the purposes of internal security of the Union institutions (OJ L37/144 08/02/2019).

3) the data subject has given <u>consent</u> to the processing of his or her personal data for one or more specific purposes (Article 5(1)(d) of Regulation (EU) 2018/1725)

The following purpose is based on consent: "Providing access to the EU JournaList directory for the Permanent Representations of the EU Member States to the EU for communication purposes", as mentioned at Section 2.1. This means that Permanent Representations would be able to contact journalists directly e.g. for contacting them or sending them newsletters.

4) Consent is obtained via a checkbox in the JournaList form with the following disclaimer: "I agree that my contact details be shared with the Permanent Representations of EU Member States in Brussels for communication purposes".

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

In order to carry out this processing operation the Data Controller may collect the following categories of personal data:

- Personal data provided by applicants via the JournaList e-registration form:

- i. Compulsory personal data: name and surname, gender (Mr./Ms.), profession/occupation, place and date of birth, nationality, photo, specific contact details (at least one mobile number, email address and private address including postal address and country of residence), copy of ID/passport, proof of main or secondary residence in Belgium (either a copy of Belgian ID or equivalent, a copy of the certificate of registration in the "commune" of residence, or a housing rental contract), associated media organisation, educational background, professional experience, including details on current and past employment (duration of employment), proof of recent journalistic work
- ii. Non-compulsory data: additional contact details (mobile/phone numbers, URL, Twitter account username)
- Additional information provided by freelance journalists: proof of recent EU-related coverage, proof of payment for regular and sustained journalistic work
- Contact information available via the EU JournaList Directory:
  - Compulsory data: name, surname, gender, media organisation, professional email and country of origin
  - Non-compulsory data: photo, additional contact details (e-mail, phone number, Twitter account username, other contact information)
- The categories of data processed by the EU Login application are described in the respective notification of DIGIT (<u>DPR-EC-03187</u>)
- The categories of data processed for security purposes to access Commission premises are described in the respective record of DG HR.DS (<u>DPR-EC-00655</u>). The categories of data processed for security investigations are described in the respective records of DG HR.DS (<u>DPR-EC-00676</u> and <u>DPR-EC-00677</u>).

Providing compulsory personal data is mandatory to meet a statutory requirement (see Section 3). If you do not provide your compulsory personal data and supporting documents, your application will not be considered.

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

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing:

# 5.1. Personal data provided via the JournaList e-registration form

Personal data relating to a journalist whose period of accreditation has expired is stored in the accreditation database for a maximum of five (5) years from the time of their request for accreditation, except where deletion is expressly requested by the data subject (in such cases, the data will be deleted within thirty (30) working days following the reception of the request).

Personal data of the rejected requests is stored for two (2) years from the time of their request for accreditation.

The retention period for the purpose of security and access to the Commission premises is governed by the record on the Commission Physical Access Control System (<a href="DPR-EC-00655.1">DPR-EC-00655.1</a>). Data is retained until the termination of the link between the individual and the

Commission plus 6 months and will vary based on the type of link (e.g. a visitor's data will be retained until the end of the visit plus six (6) months).

#### 5.2. Contact information available via the EU JournaList directory

Contact details are available via the EU JournaList directory for a period of accreditation (maximum one (1) year) and then removed.

#### 5.3. Reports, paper and electronic records, including Ares records kept by DG COMM

All paper and electronic records concerning the day-to-day correspondence and reports containing aggregated data including ARES records are kept for a period of ten (10) years according to the Common Commission Level Retention List (SEC(2019)900/2) and then removed.

# 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 <u>Commission Decision (EU, Euratom) 2017/46</u> of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the Commission, and by confidentiality obligations.

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

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

Access to your personal data is provided to the authorised personnel of the EU institutions responsible for carrying out this processing operation and to the members of the Interinstitutional Accreditation Committee according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The following recipients have access to the EU JournaList directory:

- Authorised staff of the Commission involved in the accreditation procedure;
- Commission staff of DG HR.DS responsible for handling requests for access cards and carrying out the security inquiries and investigations in order to prevent and control risks to security;
- EU staff in charge of communication within EU institutions and bodies;
- EU staff of the specific press departments of the EU Agencies;
- Personnel responsible for the security of EU institutions and bodies;
- Board members of the International Press Association (IPA);
- Staff in charge of communication within the Permanent Representations of Member States to the EU.

Authorized staff of the Commission services responsible for managing and granting accreditations, have access to the personal data provided via JournaList e-registration form in order to handle an applicant's accreditation request and to provide physical access to the European institutions.

Mandated Commission staff of DG HR.DS may have access to the personal data provided via JournaList e-registration form in order to carry out investigations as explained in records of processing operations DPR-EC-00676 and DRP-EC-00677 which are under HR's responsibility.

Authorized staff of the other EU institutions involved in the accreditation procedure have temporary access to the personal data provided via the JournaList e-registration form in order to evaluate an applicant's accreditation request and to decide whether it fulfils the criteria for media accreditation to the EU institutions.

Board members of the International Press Association have access to the personal data provided via the JournaList e-registration form (for the duration of validation) for the purpose of facilitating the evaluation of selection or eligibility criteria under the accreditation and/or consultation procedure and for performing other obligations set out in the arrangements between the IPA and the Commission.

Directorate-General for Communication, Unit D.4 (COMM.D.4) might gain access to personal data as part of their tasks in technical support.

# 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. As regards this processing operation, you can exercise the following rights:

- the right to access your personal data (Article 17 of Regulation (EU) 2018/1725);
- the right to rectification in the case that your personal data is inaccurate or incomplete (Article 18 of Regulation (EU) 2018/1725);
- the right to erasure of your personal data (Article 19 of Regulation (EU) 2018/1725);
- where applicable, the right to restrict the processing of your personal data (Article 20 of Regulation (EU) 2018/1725);
- the right to data portability (Article 22 of Regulation (EU) 2018/1725);
- and the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You have consented to provide your personal data to the Directorate-General for Communication, Spokespersons' Service for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.

You can exercise your rights by contacting the Data Controller or, in case of conflict, the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Section 9.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. Record reference(s) as specified under Section 10) in your request.

# 9. Contact information

# **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, Directorate-General for Communication, Spokespersons' Service (COMM-PRESS-ACCREDITATIONS@ec.europa.eu)

# The Data Protection Officer (DPO) of the Commission

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

## 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) 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.

# 10. 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: <a href="http://ec.europa.eu/dpo-register">http://ec.europa.eu/dpo-register</a>.

This specific processing operation has been included in the DPO's public register with the following Record reference: <u>DPR-EC-00079.3</u>