



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation: 'European Citizens' Initiative Week' online event**

**Operational Data Controller: European Commission, Directorate-General, Unit SG.DSG1.A.1 'Policy Priorities & Work Programme';**

**Record reference: DPR-EC-01063.1**

### **Table of Contents**

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

## 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 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.

The European Citizens' Initiative (herein also 'ECI') is a participatory democracy instrument that allows citizens to suggest concrete legal changes in any field where the European Commission (herein also the 'Commission') has power to propose legislation. The legal framework applicable to this instrument is set out in [Regulation \(EU\) 2019/788](#) of the European Parliament and of the Council of 17 April 2019 on the European Citizens' Initiative (herein also 'ECI Regulation').

This privacy statement explains the reason for the processing of your personal data in the context of the **online event 'European Citizens' Initiative Week'**. It explains 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 this processing operation carried out by Unit SG.DSG1.A.1 'Policy Priorities & Work Programme' of the European Commission, is presented below.

The Commission has outsourced part of the organisation of the event to an external contractor. This contractor is GOPA.com, established in Belgium. On behalf of the Commission, the contractor acts as data processor with regard to the personal data of the participants to the event.

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

Purpose of the processing operation: Unit SG.DSG1.A.1 'Policy Priorities & Work Programme' of the European Commission collects and further processes your personal data to make it possible for you to register and participate in the online event 'European Citizens' Initiative Week' and to provide you (before, during and after) with information about this event.

The Commission is using the online platform Interactio (for speakers and moderators). Questions and comments from participants will be collected via sli.do and social media channels (Instagram, Facebook, Twitter, LinkedIn), as well as through direct emails to the dedicated mailbox 'SG-ECI-Week@ec.europa.eu'. The third party service providers mentioned before may process personal data such as device information, IP addresses, log information and location data in accordance with their privacy and data protection policies. We recommend that users read carefully the relevant privacy policies regarding the use of these platforms before using them. For additional information, please see under heading seven below.

To reach the widest audience possible and as the event is addressed to citizens at large, there will be live web-streaming and audio-visual recording of the speakers, moderators and organisers during the various sessions part of the 'European Citizens' Initiative Week'. The web-streaming and audio-visual recording will include: presentation and answers involving speakers and moderators; references to questions and comments submitted by participants in writing, and the identity of their authors mentioned if this had been revealed by their authors. If you do not want your name to be mentioned, please submit your questions or ideas anonymously. The recording will be published on the event webpage.

Furthermore, to promote the event, photographs involving speakers, moderators and organisers will be taken and published on European Commission websites.

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

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

The processing operations on personal data, linked to the organisation, management, follow-up and promotion of the digital event **'European Citizens' Initiative Week'** (including web-streaming, photos, audio-visual recording) are necessary to raise public awareness about the existence, objectives and functioning of the European Citizens' Initiative, as mandated by Article 18(1) of the ECI Regulation. Furthermore, the processing is necessary for the management and functioning of the Commission, as mandated by the Treaties. Those provisions are in particular, Article 11 of the Treaty on European Union, Article 15 of the Treaty on the Functioning of the European Union and. Consequently, those processing operations are lawful under Article 5(1)(a) of Regulation (EU) 2018/1725 (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) and Article 5(1)(b) (processing is necessary for compliance with a legal obligation).

Furthermore, for the following processing activities your consent is required:

- the processing of your personal data for inviting you to participate in future events or in consultation activities the data controller may organise;
- the processing of your personal data to enable your questions and suggestions in relation to the event and the European Citizens' Initiative (collected via sli.do, social media channels or sent to the dedicated mailbox 'SG-ECI-Week@ec.europa.eu') to be addressed during the various sessions of the event;
- the processing of your personal data for managing your subscription to a newsletter of the data controller which provides regular news and updates about the European Citizens' Initiative.

If you opt-in, you are giving us your explicit consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to process your personal data for those specific purposes. You can give your consent via a clear affirmative act by ticking the box(es) on the online registration form.

Your consent for these services can be withdrawn at any time in the following manner:

- For unsubscribing from the newsletter, please click on the unsubscribe button at the bottom of the newsletter email.
- For withdrawing consent that you have provided in order to benefit from other services, please contact the controller of the meeting/event at [SG-ECI-INFO@ec.europa.eu](mailto:SG-ECI-INFO@ec.europa.eu).

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

In order to register for the event, you need first to register via the European Commission 'EU Login' Authentication Service. Your data provided on this occasion is subject to the privacy statement of the European Commission Identity & Access Management Service (IAMS)<sup>1</sup>.

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<sup>1</sup> See data processing notification DPO-839.4 Identity & Access Management Service (IAMS) at <http://ec.europa.eu/dpo-register> and the corresponding specific [privacy statement](#). Please consult

The following personal data will be processed in the context of the event:

- your title, first name and last name;
- your e-mail address;
- the type and name of your organisation and your job title;
- the country and city (of work);
- views and comments made orally (by the speakers and moderators) or in writing (by participants) in the context of the online event may contain personal data or be considered as such.

[Interactio](#), [Sli.do](#) and the social media channels ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#)) are collecting and processing additional information in line with their privacy policies.

## 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.

For each of the categories of personal data that is processed, please find below the retention details and the reference to the relevant record of processing:

- All personal data related to the organisation and management of the **event** (this includes the information given during the registration, before, during or after the event) will be deleted **one year** after the last action in relation to the **event**.
- Recordings from the web-stream of the **various sessions part of the Week** will be kept for **2 years** before being deleted. More information is available in the Record of Processing DPR-EC-00306 (Web-streaming of Commission events).
- Personal data shared with the controller for future mailing purposes (e.g., for receiving newsletters or invitations to similar events) are processed in line with the Record of Processing: [DPR-EC-00068](#).
- Selected service providers for organisational purposes (such as event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process and protect it from unauthorised access, use and retention.
- Information you have provided as part of your registration at the EU Login Authentication Service. Time limits of the retention of data in the EU Login Authentication Service are defined in the privacy statement of the European Commission's Identity Management Service<sup>2</sup>.

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this specific privacy statement for the relevant information corresponding to points 4-9 of the present privacy statement.

<sup>2</sup> <https://intragate.ec.europa.eu/cas/privacyStatement.html>

[Interactio](#), [Sli.do](#) and the social media channels ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#)) may keep data they process in relation to the use of their services for a longer period in accordance with their privacy policies.

## **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 European Commission or of its contractors. 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's contractors are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation ('GDPR' - [Regulation \(EU\) 2016/679](#)).

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 this processing operation.

The Data Controller is processing your personal data under Regulation (EU) 2018/1725 for the purposes of this online event. If you decide to take photographs/audio-visual recordings of the event and/or publish them online, you assume full responsibility for these actions. The same applies if you download the recordings that will be published online after the event and publish them on the Internet. The Data Controller shall not be held accountable for any processing of personal data that you might carry out on your own initiative during or after the event.

## **7. 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 operation and to other authorised Commission staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Where necessary, we may also share your information with a service provider, [GOPA.com](#), for the purposes of organising the event and keeping you informed about it.

Live web-streaming and audio-visual recording at the event 'European Citizens' Initiative Week' of the speakers, moderators and organisers, as well as photographs of the speakers, moderators and organisers will be taken and may be published on European Commission websites – see point 2 above.

## **Cookies**

Cookies are short text files stored on a user's device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

The registration for the event takes place via a Commission website. The cookies employed by the Commission on the registrant's device for that purpose will be covered by the cookie policy of the Commission, which is available here: [https://ec.europa.eu/info/cookies\\_en](https://ec.europa.eu/info/cookies_en).

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites on EUROPA. More information is available in the Record of Processing DPR-EC-00685 (Europa Analytics).

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the meeting/event website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission's control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

[Interactio](#), [Sli.do](#) and the social media channels ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#)) use cookies in line with their privacy policies.

#### **Third party IT tools, including Social Media**

We use third party IT tools to inform about and promote the 'European Citizens' Initiative Week', as well as to collect citizens' suggestions for further improvements of the European Citizens' Initiative through widely used communication channels, including the social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

The Commission is using the online platform [Interactio](#) (for speakers and moderators), Q&A and polling functions provided by [sli.do s. r. o.](#) as well as social media channels ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#)) for promotion and collection of suggestions from citizens. We recommend that users read carefully the relevant privacy policies regarding the use of these platforms before using them.

The use of a third party IT tool does not in any way imply that the European Commission endorses them or their companies' privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

Users understand and acknowledge that the interaction with participants before and during the event takes place externally to the Commission IT infrastructure via the platforms mentioned above. Part of the underlying infrastructure processing these exchanges might be located outside the European Union. Therefore, users must be aware of the risk of a breach of confidentiality of the information shared via these platforms and must not use the service for sharing sensitive information.

Users agree not to use these platforms to transmit any content that is unlawful and that contains software viruses or similar harmful components or routines.

## International transfers

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.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Interactio stores all data and backups within EU Territory.

Participants understand and acknowledge that submitting suggestions and comments via [sli.do](https://sli.do) and social media ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#)) takes place externally to the Commission IT infrastructure via the platforms mentioned above. Part of the underlying infrastructure processing these exchanges might be located outside the European Union. Therefore, users must be aware of the risk of a breach of confidentiality of the information shared via these platforms and must not use the service for sharing sensitive information.

## 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. 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.

If you are a speaker external to the Commission, or if you submitted questions or comments with your name that have been addressed in one of the sessions of the event, or if you have consented to provide your personal data to the controller for receiving invitations to future events organised by the controller, or for receiving the controller's newsletter, you can withdraw your consent at any time by notifying the data controller. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the 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 Heading 9 below.

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

As regards the information you have provided as part of your registration at the EU Login Authentication Service, please consult the specific privacy statement of the European Commission's Identity Management Service<sup>3</sup>.

## 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, using the functional mailbox [SG-ECI-INFO@ec.europa.eu](mailto:SG-ECI-INFO@ec.europa.eu).

### - The Data Protection Officer (DPO) of the Commission

You may contact the 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.

### - 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.

## 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 European Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

Record reference: DPR-EC-01063.1

*If you decide to take photographs/audio-visual recordings of participants of the Conference and/or publish them online, you assume full responsibility for these actions. The data controller shall not be held accountable for any processing of personal data that you might carry out on your own initiative during or after the event.*

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<sup>3</sup> <https://intragate.ec.europa.eu/cas/privacyStatement.html>