



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: BriefingNet

Data Controller: Secretariat-General, unit SG.A.4-Briefings for the President and the Vice-Presidents

Record reference: DPR-EC-02627

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1. 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 \(EU\) 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.

This privacy statement concerns the processing operation "*BriefingNet*" undertaken by unit A.4 in the Secretariat-General of the European Commission is presented below.

BriefingNet is a SharePoint application which has been highly customised and is available only to internal authorised users, who are granted access related to their professional duties, strictly on a need-to-know basis. It provides the means for the preparation and management of briefings, for the President, Vice-Presidents and the Secretary-General (users of the briefing), and for gathering political intelligence.

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

Purpose of the processing operation: SG.A.4 collects and uses your personal information to prepare briefings for meetings and/or events in which the President, Vice-Presidents and the Secretary-General (users of the briefing) participate.

Two types of personal information are collected:

A. Information collected as part of the briefing preparation process: briefing files may contain CVs of interlocutors (public persons) whom the European Commission recipients concerned (users of the briefing) is meeting, or lists of participants in the event in which the European Commission users of the briefing is participating. The data is can be provided by the organisers of the event or by the interlocutor's side. This kind of information can also be taken from official sites (for example a country's Government site) or other open source sites (for example Wikipedia). Occasionally, personal data can also include public statements made or political opinions expressed, reveal religious, philosophical beliefs or trade union membership.

B. Information related to the management of the briefing and functioning of the system: as it is based on Microsoft Office SharePoint, it generates automatically a number of logs, which are mainly used for preparation, management and delivery of the briefing as well as for reporting and administrative purposes, such as the annual management plan. Collected data of authorised Commission staff using the system consist of their name, surname, DG to which they belong, access date and time.

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:

(a) 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 (Article 5(1)(a) of Regulation (EU) 2018/1725)

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

Legal basis:

Articles 244-250 TFEU (2008/C 115/01).

Art. 17 paragraph 6 TEU

Art. 249 TFEU

[C\(2010\) 1200](#), consolidated version of the Commission rules of procedure (amended by [C\(2011\) 9000](#))

[C\(2010\) 1200](#), Annex, rules giving effect to the rules of procedure (amended by [C\(2013\) 3837](#))

[P\(2019\) 2](#) Communication from the President to the Commission: The Working Methods of the European Commission.

The legal basis for establishing, functioning and operation of the Commission is laid down in the Treaty on European Union and the Treaty on the functioning of the European Union.

As stipulated in article 249 of the Treaty on the Functioning of the European Union, the Commission adopts and publishes its Rules of Procedure as to ensure operation of its departments that prepares and performs Commission's tasks. The President of the Commission sets out the policy guidelines of the Commission and is assisted by the Commission's Secretary-General so that the Commission achieves the priorities that it has set. The Secretary-General shall also help to ensure political consistency. This is notably ensured by the Secretariat-General services when preparing briefings for the President, the Secretary-General and the Vice-Presidents to support them in conducting meetings and participating in high-level events, to achieve the Commission's objectives.

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

In order to carry out this processing operation SG.A.4 collects the following categories of personal data:

- CVs and lists of participants are collected as part of the briefing preparation process: briefing files may contain CVs of interlocutors (public persons) whom the European Commission recipients concerned (users of the briefing) is meeting, or lists of participants in the event in which the European Commission recipients concerned (users of the briefing) is participating. The data is can be provided by the organisers of the event or by the interlocutor's side. This kind of information can also be taken from official sites (for example a country's Government site) or other open source sites (for example Wikipedia). Occasionally, personal data can also include public statements made or political opinions expressed, reveal religious, philosophical beliefs or trade union membership.
- Name, surname, DG to which they belong, access date and time of authorised Commission staff using system are collected for preparation, management and delivery

of the briefing as well as for reporting and administrative purposes. The data is collected from European Commission's internal databases

5. How long do we keep your personal data?

SG.A.4 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for 18 months after event has taken place in so far as CVs and participants lists are concerned as well as the system access data. Entries of requests for access to the system or revocation of access, requests for the exercise of data subject rights are kept for 5 years. Data collected that form a part of a briefing document itself (e.g. political statements and/or opinions, details of contact person responsible for a briefing, etc) are kept in accordance with category 2.2.2 of the common retention list for Commission documents and files ([SEC \(2019\) 900](#)), namely 5 years as from the closure of the administrative file to which the specific briefing belongs.

Data collected that form a part of a briefing document itself will be transferred to the Commission's historical archives at the end of the retention period for permanent preservation (for further information, see processing operation 'Management and long-term preservation of the Commission's archives', reference: DPR-EC-00837).

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. 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 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 Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

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.

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

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 is 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.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

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 8 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 9 below) in your request.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days. The period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

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: Unit SG.A.4 in Secretariat General, SG-BRIEFINGS-PRESIDENT@ec.europa.eu

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (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) 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: <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-02627**