

Privacy Statement

This privacy statement explains how the Institution Building Unit of Directorate General for Enlargement, European Commission, handles professional data of the public sector experts or assimilated agents participating in Twinning activities and the measures taken to manage and protect these data.

I. Brief overview

Twinning is an initiative of the European Commission launched in 1998 in the context of the preparation for enlargement of the European Union. It was initially conceived as an instrument for targeted administrative co-operation to assist Candidate Countries (CC) to strengthen their administrative and judicial capacity to implement Community legislation as future Member States (MS) of the European Union. It continues to play a vital role in the new MS under the Transition Facility (TF) where it targets the further strengthening of administrative capacity. In 2001 it has been introduced as an effective instrument for Institution Building assistance in the Western Balkans to promote the European stabilisation policy. As from 2003, Twinning is also available to some of the Newly Independent States and to countries of the Mediterranean region in the context of the European Neighbourhood policy to foster enhanced co-operation.

Twinning projects are based on **a small number of basic principles**:

- Twinning is a joint project of a grant nature reserved for targeted co-operation between public administrations. Expert input is limited to public servants or assimilated agents
- Twinning projects must yield a concrete operational result in terms of the Beneficiary Country (BC) meeting a requirement in connection with the EU acquis or other EU policies open for co-operation (the so-called mandatory result);
- To underpin the credibility of their commitment, the Twinning partners in MS and BC jointly draft a detailed Twinning work plan with corresponding budget, before starting work.

To set up Twinning projects, the European Commission relies on the co-operation and administrative experience of Member States through the mobilisation of experts from their national and/or regional administrations and from a range of institutions and organisations in the semi-public sector, duly accredited by the European Commission on the proposition of the Member State administrations (the so-called mandated bodies).

Twinning projects are built around the secondment of at least one full time long-term MS expert to BC administrations. They are called “**Resident Twinning Advisers**” (RTAs). Twinning projects also encompass a series of other actions and inputs by the public administrations involved such as counsel and advice by medium- and short-term public sector experts, training sessions and work shops, study visits and expert missions etc.

A Twinning manual contains the complete overview of the contractual and financial rules governing the launching and implementation of Twinning projects in each of the regions open to Twinning. This manual is available at the following Internet address: http://ec.europa.eu/enlargement/twinning/index_en.htm.

II. What personal information do we collect, by what means, and for what purpose?

A. What information is collected?

The Commission is in charge of the overall co-ordination and promotion of the Twinning instrument (See Section 2.6 of the Twinning Manual).

In this capacity the Commission (both at the level of the services at headquarters and at the level of Delegations in the beneficiary countries) is informed by the providing Member State administrations about the professional contact details (identity, professional position held, professional contact details and very often curriculum vitae) of all Twinning experts, namely:

- 1. National Contact Points (NCPs) for Twinning respectively appointed by each of the 27 providing Member State administrations and by each of the beneficiary countries as institutional contact points for the general promotion and management of Twinning and
- 2. Resident Twinning Advisors as well as Twinning Short Term Experts proposed and appointed by the participating Member State administrations (through the NCPs) for the transfer of peer public sector expertise.

B. Specific data collected

1. Twinning Contact points in Member States and beneficiary countries

Twinning contact points in Member States and beneficiary countries submit their professional data via correspondence and/or e-mail.

Contact details
Professional address*
Last name*
First name*
Email*
Telephone*
Fax
Institution*
Department
Function *
Street*
Postal Code – City*
Country *

* Mandatory fields

2. Resident Twinning Advisors (RTAs) as well as Twinning Short Term Experts

The above-mentioned NCPs provide the professional data of all public sector experts of their respective administrations and/or assimilated organisations to be involved and involved in Twinning via – e-mail and/or correspondence, very often with curriculum vitae attached in a MS Word document.

Contact details	Expertise data
Professional address *	Professional experience in relation with Community acquis*
Last name*	Career overview*
First name*	EU legislation
Email*	Seniority*
Telephone*	Working language*
Fax	
Institution*	
Department *	
Street*	
Postal code – City*	
Country *	

* Mandatory fields

The curricula vitae of many of the experts mentioned under 2 (especially RTAs) are annexed to the Twinning contracts which are archived either on paper or electronically.

C. Technical information

The data mentioned above are provided to the Commission through the NCPs by means of correspondence or e-mail exchanges. The data collected are collected and archived by the Institution Building Unit (Twinning and SIGMA Co-ordination Team) by means of standard office tools either on paper or electronically.

The paper archives are stored in a separate storage room protected by general Commission security. The electronic archives are stored on a server which respects Commission rules. Active Directory is used to manage users of the domain itself, therefore a valid user name and pass word is required to access.

Some of these data may also be gathered on other supports (CD Roms, published material, etc.) for the promotion and development of Twinning as a European Institution Building instrument, notably with potential beneficiary countries.

The aforementioned data are stored and processed in accordance with 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 transfer of such data.

The present *Privacy statement* is publicly available on the Twinning website at the following address: http://ec.europa.eu/enlargement/twinning/index_en.htm.

It is also referred to in Article 7.2.10 of the Special conditions of each Twinning contract.

III. Who has access to your information and to whom is it disclosed?

All staff of the Institutional Building unit of Directorate General for Enlargement has full access rights (read, write and update) to the data provided by the NPCs regarding experts mentioned under 1 and 2 above.

This information is also available to other Commission services (including Delegations in the beneficiary countries) and EU institutions at their request and is even so disclosed to the administrations of the Member States and of beneficiary countries.

Some of these data are furthermore collected on other supports (CD Roms, published material, etc.) for the promotion and development of Twinning, notably with potential beneficiary countries.

IV. How do we protect and safeguard your data?

Paper archives are stored in a separate storage room protected by general Commission security.

Electronic data are stored in a MS access data base. The server where the database is stored is protected against intrusion and unauthorised access. A firewall and anti-virus software is also used to protect the data from viruses, Trojans and other malicious code.

V. How can you access your personal data?

A. National contact points for Twinning

National contact points (see above) may introduce a request by email (elarg-Twinning@ec.europa.eu) to consult data related to themselves and ask for their amendment or blocking. Data subjects may request for their data to be deleted, if they are being processed unlawfully. Requests will be responded to within a period of three months.

B. Twinning Experts proposed by the NCPs

Twinning experts can introduce a request by email (elarg-twinning@ec.europa.eu) to consult their data and request any amendments or blocking. Data subjects may request for their data to be deleted, if they are being processed unlawfully. Requests will be responded to within a period of three months.

VI. How long do we keep your data?

Personal data is kept for a period of up to 7 years following the last participation of a data subject in a Twinning project. After this period, the personal data will be automatically deleted.

VII. Contact Information

Data Subjects have the following means to address their questions or complaints to the European Commission concerning privacy policy:

The first level of contact is the mailbox elarg-twinning@ec.europa.eu. This mailbox is managed by the Institution Building unit of Directorate General for Enlargement, which has the controller's responsibility in relation to the Twinning data. The controller unit, whose head is Morten JUNG-OLSEN, ensures that the transfer and processing of personal data operates within the Data Protection constraints established by Regulation (EC) No 45/2001.

Further to the above, the Data Protection Officer of the European Commission Secretariat General of the European Commission B-1049 Brussels Belgium (<http://www.edps.eu.int>) can be addressed.