



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Provision of services related to eInvoicing through the Digital Platform

Data Controller: European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit G.4 - Data and Knowledge for Policy, Business and People (hereinafter “DG GROW Unit G.4” or the “Data Controller”)

Record reference: DPR-EC-24290

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 (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 the Data Controller collects, handles and ensures 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 whose contacts you may find in section 9 of this privacy statement.

The information in relation to processing operation “Provision of services related to eInvoicing through the Digital Platform” undertaken by the Data Controller is presented below.

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

The Data Controller processes your personal data to provide services that support the uptake, reuse, improvement and promotion of the eInvoicing Building Block. This aims at ultimately serving the eInvoicing policy and the adoption of the EU eInvoicing standard. These services are provided through the [Digital Platform](#), which is used to host the eInvoicing Building Block and provide guidance.

The [Digital Platform](#) is built on Atlassian tool stack (JIRA, Confluence, BitBucket, Crowd) and add-ons supported by Atlassian such as Tempo Timesheets for JIRA, Customer Satisfaction Survey for JIRA and Forms for Confluence. For more information on how personal data is processed via Atlassian tool stack, please consult the following data protection record on the Register of the Data Protection Officer (DPO) [DPR-EC-05186](#).

You can browse the Digital platform without authenticating through EU Login. In this case, no registration or login are needed and, with the exception of log data, logged for security purposes (i.e., investigations in case of a (potential) data breach), no personal information is collected or processed. For more information on the processing of log data, logged for security purposes, please consult [DPR-EC-02886](#).

The following services are provided through the Digital Platform and process personal data as outlined below:

1. *Hosting of a website*

Part of the Digital Platform is used to provide access to the [eInvoicing website](#) which informs stakeholders about the eInvoicing Building Block and related services, and provides guidance on its use. The data processed through the use of this service including the [eInvoicing website](#) and the eInvoicing Building Block related services is covered by the record of processing [DPR-EC-00083](#). Personal data is collected to enable a user to access the [eInvoicing website](#) within the europa.eu domain.

2. *Provision of a help desk*

Part of the Digital Platform is dedicated to the provision of technical support services through the [eInvoicing Help Desk](#), which are provided to handle users’ requests regarding technical

issues or questions and requests about eInvoicing matters including the eInvoicing Building Block. By requesting this service, you can, for example, benefit from the following services (the below list is non-exhaustive):

- Announce the need for technical support;
- Be contacted to obtain technical support;
- Be contacted to receive technical trainings;
- Request access to eInvoicing communities;
- Request information on eInvoicing and the European standard on eInvoicing;
- Code lists change request;
- Request services offered by eInvoicing.

In case you want to log a request for technical support, you must authenticate yourself via the European Commission's user authentication service known as EU Login (for more information on how your personal is processed via EU Login, please consult [DPR-EC-03187](#)). Atlassian JIRA ([DPR-EC-05186](#)) as well as a ticketing tool of the European Commission (such as [Service Management Tool](#) ([DPR-EC-03166.2](#), a ticketing system for IT related incidents used in the Commission) or [ServiceNow](#) (DPR-EC-18469, a ticketing system for IT related incidents and requests used in the Commission)), are then used to store the data from the request for the eInvoicing technical support and for the handling of a request (known as ticket).

Your contributions are visible only to the technical support team and, upon request, also to extended eInvoicing team, unless you share the link to your contribution with another user. In case you would like your contributions to be deleted, please contact the controller at EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu.

3. Hosting of communities

Part of the [Digital Platform](#) is dedicated to the provision, support and management of online communities which aim to facilitate the involvement of citizens, experts, companies, interest groups and any other stakeholder in projects related to eInvoicing. Collecting and using your data enables us to establish your membership within the community, to contact you regarding online and offline activities relating to the community and ensure your participation therein, and to have an overview of the various types of members of the community.

eInvoicing offers **public** as well as **closed** communities.

All users, registered or not, can access content of **public** eInvoicing communities. Users can only view content posted in the community.

Depending on the setup of a specific **closed** community, participating in a closed eInvoicing community may enable you to, for example:

- Benefit from easy access to information, tools and services related to eInvoicing;
- Post comments in a community;
- Create new discussion topics within a community;
- Contribute to discussion(s) within a community;
- Upload documents to a community;
- Collaborate/interact with other members of a community or content generated by them.

Only members of a closed community can actively contribute to the pages of a community. The particular ways of contribution depend on the setup of a specific community.

Access to closed communities is restricted and your contributions will only be visible to members of that specific community. The content posted by a community member may be moderated by the community's moderator, who acts on behalf of the European Commission.

In order to become a member of a closed community, you need to authenticate yourself via the European Commission's user authentication service known as EU Login ([DPR-EC-03187](#)) and request access to the Confluence space on which the community is hosted by clicking on the link to the space. You may need to request access to the space by logging a ticket through the Digital Platform or the eInvoicing Help Desk, or by sending an email to the eInvoicing team.

It is not necessary to register for public eInvoicing communities.

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

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

The processing operations on personal data for the **hosting of the eInvoicing website** 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 the Regulation 2018/1725**). Informing the broad public is a task resulting from the Commission's own prerogatives at institutional level, as provided for in Article 58(2) (d) of Council Regulation (EC, Euratom) No 2018/1046 of 18 July 2018 on the Financial Regulation applicable to the general budget of the European Communities (OJ L 193, 30.7.2018, p. 1). The Data Controller ensures that adequate and specific safeguards are implemented for the processing of personal data, in line with the applicable data protection legislation.

The processing operation on personal data for the provision of the **eInvoicing Help Desk** is 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). The underlying legal basis is the Regulation (EU) 2021/694 (Digital Europe Programme).

The processing operations on personal data for the **organisation and management of eInvoicing communities** are lawful under **Article 5(1)(d)** of Regulation (EU) 2018/1725, as the user provides consent before becoming a member. You can provide your consent via a clear affirmative act by ticking the box on the online pop-up form. You can withdraw your consent at any time by contacting the data controller at EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu.

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

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

1. Log Data

Whenever you access the Digital Platform, the following log data is collected:

- IP address;
- User agent (information on the device or browser the user is using);

- Timestamp;
- Targeted resource (URL).

In addition, the following data is collected whenever you access a restricted page or service on the Digital Platform for which you first need to log in through EU Login:

- User ID.

Log data is collected for security purposes whenever you access the Digital platform.

2. Provision of the eInvoicing website

In order to provide the eInvoicing website to you, the Commission collects the following categories of personal data:

- Internet Protocol address (IP address) or the device ID of the device used to access the website;
- Log data.

Without this processing you will not be able to establish a technical connection between your devices and the server infrastructure maintained by the Commission and therefore will not be able to access this website of the Commission.

3. Provision of a Help Desk

To carry out this processing operation, the Commission collects the following categories of personal data:

- Name (first and last name);
- Contact details (e-mail address, telephone number (voluntary), mobile telephone number (voluntary), company name / organisation (voluntary), country of residence (voluntary));
- Any personal data you voluntarily provide in your request message.

In addition to the data listed above, log data will be collected as outlined in section “4.1. Log data” when a request is submitted through the Help Desk on the Digital Platform. To submit a request through the Help Desk, you will be required an EU Login.

4. Hosting of communities

To carry out this processing operation, the Commission collects the necessary following categories of personal data:

In case you access a **public** community without authenticating through EU Login, the only personal data collected is log data (see section 4.1 Log data).

In case you access a **closed** community for which you need to authenticate via EU Login, the following personal data is collected:

- First name and last name (provided through EU Login);
- Email address (provided through EU Login);
- EU Login username;

- Organisation (depending on the data provided when you created your EU Login) (obtained via EU Login);
- Department (depending on the data provided when you created your EU Login) (obtained via EU Login).

In addition, the following personal data may be collected, depending on the community:

- City and country;
- Avatar or profile picture;
- Name of the company/organisation where data subject works or Member State the data subjects represents;
- Information on a project related to eInvoicing in which the data subject is involved;
- Position;
- Content published by the registered user;
- Professional background and experience;
- Motivation for joining.

Members of the community can in any case provide additional information, some of which may contain personal data:

- Articles;
- Comments;
- Pictures, text files;
- Links, e.g., to videos.

Please note that the Commission does not request nor expect that participants to the community to include (i) special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) or (ii) personal data related to criminal convictions and offences as provided for in Article 11 of Regulation 2018/1725, related to themselves or to third persons in their contributions to the Communities. Should participants nevertheless volunteer such special categories of personal data, these would be processed on the basis of Article 10(2)(a), that is to say explicit consent of the data subjects. The moderator might decide to delete such personal data on the basis of a case-by-case assessment. We have obtained your personal data from you.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the abovementioned purpose(s). For each of the categories of personal data that is processed, please find below the retention details:

1. Log data

Data is processed for accessing the Digital platform. Log data is retained for security purposes as of the moment the user accesses the Digital platform and is deleted after 1 year (for more information see record of processing [DPR-EC-02886](#) (DIGIT IT security operations and services).

2. Provision of the eInvoicing website

The Commission only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for the duration of the browsing session.

3. *Provision of a help desk*

Personal data pertaining to the user is retained as of the moment it is made available by the user by submitting a request for support and is retained for up to five years after your last request of technical support (i.e., after the last communication with help desk).

4. *Hosting of communities*

Personal data pertaining to you as a community user (all personal data that is mandatory to create an account) is kept for as long as the service is provided to you and will be retained for up to 5 years after your last request.

Personal data linked to activities in a community is retained the moment the user makes this data available (when content is posted, for instance) and is kept for 5 years after the last interaction of the user in a community, or until the user deleted the data.

You also have the possibility at any moment to modify or cancel your EU Login account (data). In this case, all your contributions will be anonymised and you will not have access to the history of your interactions with technical support service without EU Login authentication mechanism.

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, including intra-muros consultants according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Insofar as you participate in a *closed eInvoicing community*, your data is visible to other members of the community. They can see:

- Your first name and last name;
- Your profile picture (if provided);
- The content of your posts as well as the documents you upload;
- All other personal data you choose to disclose about yourself.

Insofar as you *submit a request through the eInvoicing Help Desk*, your first name and family name are published together with your contributions. Your username is visible to any user who receives the link to your contribution.

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.

The information the Data Controller collects will not be given to any third party, except to the extent and for the purpose Data Controller may be required to do so by law.

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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or 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, as explained below.

Insofar as you have consented to provide your personal data to the data controller for the present processing operation. You can withdraw your consent at any time by notifying the data controller by writing to EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu. 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.

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

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.

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, European Commission - Unit GROW G4 - Data and Knowledge for Policy, Business and People - E-mail: EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu.

- The Data Protection Officer (DPO) of the Commission

In case of disagreement with the Data Controller, 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 or https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) 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 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-24290.