



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 invoicing Testing services

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

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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 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 eInvoicing Testing services” 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 the Conformance testing service to the users of the Conformance testing service. The objective of this service is to provide you with the eInvoicing conformance testing service and to keep a record of actions taken in this regard.

The eInvoicing conformance testing service offers a test infrastructure that allows solution and service providers, public entities and software owners, to check the conformity of their existing eInvoicing solutions against the core invoice format of the European standard on eInvoicing (EN). In addition, the test infrastructure provides results and overall services in order to be able to run the testing infrastructure.

Personal data collected through the eInvoicing testing service is related to the access management, registration and provision of testing services, testing-related communication with users (e.g., notifying of passing test to specifications, testing related events, etc.), and the revision and reuse of historical data related to the conformance tests performed by users.

The eInvoicing conformance testing service is operated through the [Interoperability Test Bed](#), a service that the European Commission maintains to enhance the conformance testing service offered to initiatives involved in the delivery of cross-border public services. The Interoperability Test Bed may process personal data in the context of providing conformance testing services. For more information on the processing of personal data by the Interoperability Test Bed, please refer to the [Interoperability Test Bed legal notice](#) and the reference on the following Data Protection Record on the Register of the Data Protection Officer (DPO) [DPR-EC- 01844](#) (JOIN-UP website) as a baseline.

The eInvoicing Conformance testing service can be requested through three scenarios:

- **Web form upload (only for sender scenario):** The user can request validation via uploading the invoice.xml file(s) through <https://www.itb.ec.europa.eu/invoice/upload>. Users do not need to create an account on the Interoperability Test Bed to access the service.
- **Web service (only for sender scenario):** The user can request the validation of an invoice via a web service call to a GITB-compliant content validation service. The web service is available at: <https://www.itb.ec.europa.eu/invoice/api/validation?wsdl>. To

use this service, the user first needs to contact the eInvoicing Help Desk to obtain relevant configuration files for the SOAP UI test case.

- **eDelivery AS4 option:** The user can choose to send or receive an eInvoice via eDelivery AS4. To use this service, at least one user needs to create an account on the [Interoperability Test Bed platform](#). To create an account, the user needs to log in with the European Commission's user authentication service known as EULogin ([DPR-EC-03187](#)). The user may then need to link and assign a role or registered organisation to their account by clicking on "Link a role to your account" and choosing "Register in a public community". The user then provides the Token for joining the eInvoicing community and registers their organisation by indicating a short name and long name for the organisation, as well as the Access Point (gateway) implementation. After the successful registration, the user will be redirected to the home page of the eInvoicing Test Platform and will be able to select test cases to be executed.

For scenario 2, a user must log a request through the eInvoicing Help Desk. In this context, personal data will be processed as described in the eInvoicing Record of processing (DPR-EC-24290).

Further data may be collected on a voluntary basis within the testing software and stored to perform tests through a combination of online forms and web services.

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 Data Controller processed your personal data, because 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), in particular Article 8 (1) of the Regulation (EU) 2021/694 (Digital Europe Programme).

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:

- Name (first and last name);
- Test case and test run actions the user has performed on the conformance test platform;
- EU Login user ID;
- Email address;
- Organisation name (full name and short name).

Other information may be provided on a voluntary basis.

We have obtained your personal data directly 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. Personal data is retained for up to 10 years after the user's last request, considering the usefulness of the data in case users want to re-run conformance tests.

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

Personal data processed by the Interoperability Test Bed in the context of eInvoicing testing services are stored in solution-protected databases maintained on the Azure cloud infrastructure and is only accessible to permitted authorised staff (authorised technical and support staff, intra-muros consultants) for technical support issues.

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 the 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.

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, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit G.4 - Data and Knowledge for Policy, Business and People, at 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.