



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Testing

Data Controller: European Commission, Unit H.4, Directorate-General for Communications Networks, Content and Technology (DG CNECT)

Record reference: [DPR-EC-07046.1](#)

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 (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.

The information in relation to processing operation “Testing” undertaken by Unit H.4, Directorate-General for Communications Networks, Content and Technology (DG CNECT) of the European Commission is presented below.

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

Purpose of the processing operation: Unit H.4, Directorate-General for Communications Networks, Content and Technology (DG CNECT) of the European Commission collects and uses your personal information to provide you with testing service and to keep a record of actions taken in this regard.

The objective of the testing services is to give a possibility for stakeholders deploying Digital Building Blocks to identify possible configuration and other technical issues for its roll-out or to determine whether an implementation of a Building Block meets the requirements set out in technical specifications. Personal data collected through Digital Building Block 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.), revision and reuse of historical data related to the conformance tests performed by users, and publishing on-demand contact details of service providers who successfully passed a conformance test.

The following testing services are provided by Digital Building Blocks:

Connectivity testing: The objective of the connectivity testing service is to help users test the correct deployment and configuration of a Digital Building Block. The service is operated through the Digital Europe’s Help Desk and is provided by: eDelivery, eSignature, and eID.

Conformance testing: The objective of the conformance testing service is to verify that an implementation of a Digital Building Block conforms to the relevant Building Block specifications. The service is operated through the Digital Europe’s Help Desk and is provided by: eInvoicing, eDelivery, and EBSI.

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

The processing operations on personal data linked to the testing services described in this document 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).

Under the Connecting Europe Facility (CEF) Programme, the legal basis for this processing were the CEF regulation (Regulation (EU) No 1316/2013 of the European Parliament and of the Council of 11 December 2013 establishing the Connecting Europe Facility, amending Regulation (EU) No 913/2010 and repealing Regulations (EC) No 680/2007) and Regulation (EU) No 283/2014 on guidelines for trans-European networks in the area of telecommunications infrastructure and repealing Decision No 1336/97/EC. According to Article 5(1)(a), processing is necessary for the performance of a task carried out in the public interest, based on Section 1 of the Annex to the Regulation (EU) No 283/2014, which stipulates that "Building block digital service infrastructures take priority over other digital service infrastructures, since the former are a pre-condition for the latter. The generic services provide the connection to the core service platforms and enable the national added value services to use the core service platforms. They provide gateways between national services and core service platforms and allow national public authorities and organisations, businesses and/or citizens to access the core service platform for their cross-border transactions. The quality of the services and the support for stakeholders involved in cross-border transactions must be ensured. They must support and stimulate the take-up of core service platforms." This should be read in the light of Recital (20) of the Regulation 1316/2013 of the European Parliament and of the Council of 11 December 2013 establishing the Connecting Europe Facility, amending Regulation (EU) No 913/2010 and repealing Regulations (EC) No 680/2007 and (EC) No 67/2010 "Institutional and administrative capacity are essential prerequisites for effective delivery of the objectives of the CEF. The Commission should, as far as possible, offer appropriate means of support to permit the design and implementation of projects in the Member States concerned."

Under the Digital Europe (DEP) Programme, your personal data is processed on the basis of Article 8 (1) of the Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme and repealing Decision (EU) 2015/2240, which states that the Union shall pursue objectives such as "[...] (b) *deploy, operate and maintain trans-European interoperable state-of-the-art digital service infrastructures across the Union, including related services, in complementarity with national and regional actions; (c) support the integration and use of trans-European digital service infrastructures and of agreed European digital standards in the public sector and in areas of public interest to facilitate cost-efficient implementation and interoperability; (d) facilitate the development, update and use of solutions and frameworks by public administrations, businesses and citizens, including of open-source solutions and the re-use of interoperability solutions and frameworks; [...] (g) support the design, testing, implementation, and deployment and maintenance of interoperable digital solutions, including digital government solutions, for public services at Union level which are delivered through a data-driven reusable solutions platform aiming to foster innovation and establish common frameworks in order to unleash the full potential of the public administrations' services for citizens and businesses; [...]*"

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

In order to carry out this processing operation the data controller collects the following categories of personal data:

- Name (first and last name)
- Technical point of contact name
- Technical point of contact phone number
- Organisation name
- Title/Position in company
- Address of company
- Email address
- Phone number

- Test case and test run actions the user has performed on the conformance test platform (only for conformance testing).
- City and country
- INEA action number (for eInvoicing only)

Some other information may be requested or provided on a voluntary basis.

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. The retention periods of the services covered by this privacy statement are as follows:

Data processed for providing the Digital Building Block **connectivity testing services**:

Retention period: Personal data pertaining to the platform user is retained for up to 5 years after his/her last request of Digital Building Block connectivity testing services.

Start date description: Data is retained as of the moment it is made available by the user by submitting a request for connectivity testing.

End date description: Personal data pertaining to platform user is deleted after 5 years after the request for connectivity testing has been handled.

Data processed for providing the Digital Building Block **conformance testing services**:

Retention period: Personal data pertaining to the platform user 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.

Start date description: Data is retained as of the moment it is made available by the user by submitting a request for conformance testing.

End date description: Personal data pertaining to platform user is deleted after 10 years after the request for conformance testing has been handled.

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.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('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 basis 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 other authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

We also share your information with service providers (authorised technical and support staff, intra-muros consultants) to fulfil the provision of services, described in this privacy statement. 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. No international data transfers to third countries take place.

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.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 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 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.

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, DG CNECT, Directorate-General for Communications Networks, Content and Technology, eGovernment and Trust (CNECT.H.4), EC-DIGITAL-BUILDING-BLOCKS@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-07046.1**.