



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

Processing operation: Targeted consultation activities (inclusive of all stakeholders and both offline and online surveys, interviews and focus groups) related to eInvoicing

Controller: European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), 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.

This privacy statement concerns the processing operation ‘*Targeted consultation activities (including surveys, interviews and focus groups) related to eInvoicing*’ undertaken by the Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit G.4 as presented below.

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

Purpose of the processing operation: The Commission collects and uses your personal information within the framework of targeted consultation activities to obtain your views on a specific initiative, policy or intervention.

You are being contacted by DG GROW, Unit G.4, since the controller has concluded that your views are relevant and necessary to inform an initiative, policy or intervention related to eInvoicing concerned by the targeted consultation.

Your contact details may already be in the possession of DG GROW, Unit G.4. In this case, you may be contacted for the present targeted consultation for one of the following reasons:

- DG GROW, Unit G.4, may have collected and processes your contact details since you subscribed to, and thus gave your consent to, be part of a mailing list to be informed of / contacted in case of future consultations by the Commission. The purpose of the mailing list may be to inform subscribers of important developments, activities, policy and technical updates, events, initiatives, thematic issues and other topics related to eInvoicing, which may include the invitation to participate in consultations related to eInvoicing. The processing of your personal data in the context of subscribing to such a mailing list is based on the following data protection record on the Register of the Data Protection Officer (DPO) [DPR-EC-03928](#). Your consent to be part of such a mailing list to be informed of / contacted in case of future consultations by the Commission can be withdrawn at any time by clicking on the unsubscribe button in any of our newsletters or by contacting the controller at EC-DIGITAL-BUILDING-BLOCKS@EC.EUROPA.EU.
- You may also be contacted since the Commission processed your personal data in the context of a previous processing operation. In this operation, DG GROW, Unit G.4, considers that the further processing of your contact details for this targeted consultation activity is processing for another compatible purpose in accordance with Article 6 of Regulation (EU) 2018/1725.
- You may also be contacted since the Commission processed your personal data in the context of a previous processing activity of which the further processing of your contact details for this targeted consultation activity is an integral part. In this scenario, the targeted consultation activity is integrated into the original processing operation for which the personal data was initially collected and processed.

Where your contact details have not been in the possession of DG GROW, Unit G.4, and have been collected from public sources for this targeted consultation activity, you may be contacted for the present targeted consultation for the following reason:

- DG GROW, Unit G.4, may have collected your contact details from the internet where they have been manifestly made public by you or the organisation you work for. You have been identified by DG GROW, Unit G.4, as a stakeholder whose views are relevant and necessary to achieve the specific purpose of the targeted consultation activity in the public interest as described below. Your participation in the targeted consultation activity is completely voluntary.

You may also submit your contact details when completing a registration form for a specific targeted consultation, or when participating in a targeted consultation. Such a registration form or consultation may, for example, be published on the [Digital platform](#) (for example, on the [Digital Homepage](#), the page for [eInvoicing country factsheets](#), or an [eInvoicing User Community](#)), a European Commission website (such as [Newsroom](#)), included in an eInvoicing newsletter or other communication materials, or published on social media channels of

eInvoicing. In this case, DG GROW Unit G.4 processes your personal data because you have submitted it while participating in the targeted consultation.

More specifically, the processing operation may concern the following processing activities and purposes:

- to obtain the views of the respondents of a targeted consultation activity for the design, evaluation and revision of policies, initiatives and interventions. To design, evaluate and revise initiatives it is indispensable for the Commission to receive input and views from those who are considered to be concerned by the policy, initiative or intervention.
- to obtain the views of stakeholders to explore a subject for which very limited information is available. This exploratory targeted consultation activity (hereafter, 'targeted consultation') will provide further information to the Commission necessary to take basic conceptual decisions.

For reasons of transparency and openness your views may, in principle, be published on a European Commission's website within the Europa.eu domain, in particular the [Digital website](#), the page for [eInvoicing country factsheets](#) on [the Digital platform](#), the [eInvoicing User Community](#), included in the eInvoicing newsletter or other communication materials, or published on social media channels of eInvoicing, in the form of a summary report. The Commission only publishes quotations or your identity if you consent to the publication.

To avoid misuse, anonymous contributions to the Commission may not be accepted, regardless whether you consent to the publication of your identity together with your contribution.

In the context of a targeted consultation activity, you may be photographed and/or audio- or video-recorded. Photographs may be published together with your contribution to improve the accessibility and presentational value of your contribution to stakeholders. Photographs will only be published subject to your explicit consent by ticking the box(es) on the registration or survey form as outlined in section 3 of this privacy statement. Audio or video recordings may be necessary to transcribe the answers you provide, and/or to publish them to improve the accessibility and presentational value of your contribution to stakeholders. Photographs, audio- or video-recordings may be published on European Commission's websites within the Europa.eu domain, in particular the [Digital website](#), an eInvoicing user community, included in an eInvoicing newsletter or other communication materials, or published on social media channels related to eInvoicing. Photographs and audio- or video-recordings containing any of your personal data will only be published subject to your explicit consent by ticking the box(es) on the registration or survey form as outlined in section 3 of this privacy statement.

The subject matter of the consultation activity may require you to provide personal data in your response that may identify or make you identifiable. These personal data will only be published subject to your explicit consent by ticking the box(es) on the registration or survey form as outlined in section 3 of this privacy statement.

It is your responsibility if you opt for confidentiality of your personal data to avoid any reference in your submission or contribution itself that would reveal your identity.

During a targeted consultation, you may be asked to connect to third-party IT tools which process personal data, such as the ones outlined below.

- [Miro](#): You may be asked to connect to Miro in order to share your ideas, experiences and perspectives related to the eInvoicing, or to take part in user journey definitions.

- [Maze](#): You may be asked to connect to the online testing tool Maze in order to participate in usability tests related to eInvoicing.
- [Microsoft Forms](#): You may be asked to connect to Microsoft Forms in order to participate in live polls or questionnaires. Microsoft Forms is part of the Microsoft Office 365 environment, which has a specific record of processing [DPR-EC-4966](#).
- [Sli.do](#): You may be asked to take part in polls or quizzes or to give ideas or ask questions to the organisers through the polling tool Sli.do, which has a specific record of processing [DPR-EC-06687](#).
- [Kahoot](#): You may be asked to connect to Kahoot in order to participate in live polls or questionnaires.

Please read section 7 below for more information on how your personal data is processed through these tools. Answers and information collected through these tools may be collected anonymously or linked to your name, with the purpose of identifying your inputs. Information collected through these tools may also be published in an aggregated and anonymised format as part of a targeted consultation or event report and/or articles or news items, for example on the [Digital Platform](#) (for example, at the [eInvoicing User Community](#) or the [Digital website](#)), or included in the eInvoicing newsletter or other communication materials. Your identity will not be published together with this information.

The consultation activity may use the Commission's online questionnaire tool EUSurvey that requires you to login via your 'EU Login' or 'social media account'. 'EU Login' requires certain personal data such as the name, surname and e-mail address of the registrant. For further information, please refer to the privacy statements of 'EU Login' and 'EU Survey' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: [DPR-EC-03187](#)) and 'EUSurvey' (reference number: [DPR-EC-01488](#)). Should you choose to log in through your social media account, please refer to the pertinent social media platform's privacy statement.

The consultation may also take place via email. For more information on the Email system of the European Commission, please refer to the record of processing [DPR-EC-03610](#).

You may be able to participate physically or remotely in a targeted consultation, depending on the setup of a specific consultation. Remote consultations, in particular, may take place using a third party videoconference IT service, such as Microsoft Skype for Business, Microsoft Teams or Cisco Webex, which process personal data. For more information on the processing of personal data through third party IT tools, please refer to their records of processing (Microsoft Teams ([DPC-EC-04966](#)), Microsoft Skype for Business ([DPR-EC-02548](#)), Cisco Webex ([DPR-EC-05006](#))) and section 7 of this privacy statement.

Your contribution to the targeted consultation may be stored in the Commission's document management system (for further information on the Commission's document management system please refer to the processing operation 'Management and (short- and medium-term) preservation of Commission documents', reference number: [DPR-EC-00536](#)).

The personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, the European Ombudsman, or the European Court of Auditor.

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;

(b) it is based on your consent, for one or more specified purposes:

- Publication of the identity of the stakeholder or respondent;
- Publication of photos, audio, or video recordings;
- Publication of quotations;
- If the subject matter of a targeted consultation requires respondents to provide personal data in their response that make the data subject identifiable, their publication;
- To be contacted by the Commission for the present consultation in case the respondent had previously consented to be contacted by the Commission for such type of consultation;
- To be contacted for future consultations in relation to eInvoicing;
- The processing of your personal data relating to your access requirements, in order to participate physically in a targeted consultation;
- Assisting you with any follow-up activities related to the eInvoicing;
- Processing of your personal data for inviting you to future events the data controller may organise in relation to the eInvoicing;
- Processing of your personal data for managing your subscription to a newsletter of the data controller.

If you opt-in, you are giving us your explicit consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to process your personal data for those specific purposes. You can give your consent via a clear affirmative act, for example by ticking the box(es) on the registration or survey form.

Your consent for these services can be withdrawn at any time:

- For unsubscribing from any of our newsletters, please click on the unsubscribe button in any of our newsletters;
- For withdrawing consent that you have provided to benefit from other services, please contact the data controller by email at EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu.

The Union law which is the basis for the processing based on Article 5(1)(a) of Regulation (EU) 2018/1725 is the Treaty of the European Union, and more specifically its Articles 1 and 11, Article 298 of the Treaty on the Functioning of the European Union, read in conjunction with Recital 22 of Regulation (EU) 2018/1725), as well as the Protocol 2 on the application of the principles of subsidiarity and proportionality.

The Union law which is the basis for the processing based on Article 5(1)(a) of Regulation (EU) 2018/1725 is Regulation (EU) 2021/694, being the basis for the eInvoicing activity of which this targeted consultation is part.

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

To carry out this processing operation DG GROW, Unit G.4., or one of its processors may collect the following categories of personal data:

- contact details (such as first name(s), last name, email address, telephone number);
- biographical information (such as age, gender);
- country of residence;
- information on your educational background;

- information on your professional background;
- information on the organisation you represent and your role in this organisation;
- motivation for participating in a targeted consultation;
- the name of a self-employed individual (natural persons) on whose behalf the respondent is contributing;
- the country which the respondent is representing;
- nationality, passport or identity card number and its date of issue and expiry date may be collected, so that you may obtain access to the premises where a consultation is held (only applicable in case of physical participation);
- specific access requirements, where relevant;
- personal data related to the physical, economic, cultural, or social identity of the respondent, insofar as they are not falling under Article 10 of the Regulation 2018/1725;
- personal data included in the response or contribution to the targeted consultation activity, including (personal) opinions (if the targeted consultation at hand requires so);
- photos, audio/video recording;
- interest in one or several Building Blocks.

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply to the targeted consultation.

Please note that the Data Controller does not request nor expect that data subjects provide any 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”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data the data subject is considered to provide explicit consent to the processing, in accordance with Article 10(2)(a) of Regulation 2018/1725.

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, namely for a maximum of five years after the closure of the file to which the present targeted consultation belongs. A file is closed at the latest once there has been a final outcome in relation to the initiative to which the targeted consultation contributed.

This administrative retention period of five years is based on the retention policy of European Commission documents and files (and the personal data contained in them), governed by the common Commission-level retention list for European Commission files [SEC\(2019\)900](#). It is a regulatory document in the form of a retention schedule that establishes the retention periods for different types of European Commission files. That list has been notified to the European Data Protection Supervisor.

The administrative retention period is the period during which the Commission departments are required to keep a file depending on its usefulness for administrative purposes and the relevant statutory and legal obligations. This period begins to run from the time when the file is closed.

In accordance with the common Commission-level retention list, after the ‘administrative retention period’, files including (the outcome of) targeted consultations (and the personal data contained in them) can be transferred to the Historical Archives of the European Commission for historical purposes (for the processing operations concerning the Historical Archives, please

see record of processing 'Management and long-term preservation of the European Commission's Archives', registered under reference number [DPR-EC-00837](#)).

Personal data shared with the Directorate-General for Human Resources and Security of the European Commission for the participants to gain access to Commission buildings is kept **for 6 months** after the termination of the link between the data subject and the Commission. More information is available in the Record of Processing [DPR-EC-00655](#) (Commission Physical Access Control System (PACS)).

Personal data shared with the controller for future mailing purposes (e.g., for receiving invitations to future consultations in relation to eInvoicing) are processed in line with the Record of Processing [DPR-EC-03928](#) (Management of Subscriptions to Receive Information) and the specific privacy statement prepared by the organising Commission service. Data will be kept until the data subject unsubscribes from the mailing list.

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 Commission. All processing operations are carried out pursuant to [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the 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, in particular to follow-up on the targeted consultation. Such staff abide by statutory, and when required, additional confidentiality agreements.

Certain personal data may be made public on a European Commission's website within the Europa.eu domain, in particular the [Digital website](#), the [eInvoicing User Community](#), included in the eInvoicing newsletter or other communication materials, or published on social media channels of eInvoicing, namely:

- any personal data on which you consented to their publication;
- personal data spontaneously provided by you in your contribution (without it being required by the consultation activity).

Cookies

Cookies are short text files stored on a user's device (such as a computer, tablet, or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

A targeted consultation or the registration thereto may take place via a European Commission website (such as [Newsroom](#)), or a European Commission tool EUSurvey ([DPR-EC-01488](#)). The cookies employed by the Commission on the registrant's device for that purpose will be covered by the cookie policy of the Commission, which is available here: https://ec.europa.eu/info/cookies_en.

The collection, aggregation and anonymising operations are performed in the data centre of the European Commission under adequate security measures.

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites within the Europa.eu domain. More information is available in the Record of Processing [DPR-EC-00083](#) (Processing of personal data on European Commission web sites (within the Europa.eu domain), including IP addresses, by visitors of the publicly available websites).

Third Party IT tools, including Social Media

DG GROW, Unit G.4, may use third party IT tools to inform about and promote targeted consultations through widely-used communication channels, including social media. For detailed information about the use of social media by the European Commission, see the Record of Processing [DPR-EC-00073](#) (Social Media Use by the European Commission).

You may be able to watch our videos, which may be also uploaded to one of our social media pages and follow links from our website to other relevant social media.

To protect your privacy, our use of third-party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

Users are recommended to carefully read the relevant privacy policies of the social media tools that may be used: [X \(formerly known as Twitter\)](#), [LinkedIn](#), [Facebook](#), [Instagram](#), and [Youtube](#). These explain each company’s policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

Please note that the targeted consultation may be held using a third party videoconference IT service such as Cisco Webex, Microsoft Skype for Business, or Microsoft Teams. These IT tools have their own cookies and privacy policy (available here: Skype for Business Commission [Record DPR-EC-2548](#) and [Microsoft Privacy Policy](#); Microsoft Teams Commission [Record DPR-EC-4966](#) and Microsoft [Privacy Policy](#); Cisco Webex Meetings Commission [Record DPR-EC-05006](#) and Microsoft [Privacy Policy](#)) over which the Commission has a limited or no control. By participating in the targeted consultation via a videoconference IT tool, the participants consent to the processing of their personal data via the third-party tool as described in the related privacy policy.

Please note that during the targeted consultation, you may be asked to connect to third party IT tools, such as the ones listed below. Those tools have their own cookies and privacy policies, available here:

- Miro: [Privacy policy](#) and [cookies policy](#).
- Maze: [Privacy and cookie policy](#).
- Microsoft Forms: Microsoft Forms is part of the Microsoft Office 365 environment, which has its own cookies and privacy policy (available here: Microsoft Teams

- Commission Record [DPR-EC-4966](#) and Microsoft [Privacy Policy](#)).
- Sli.do: Record of processing [DPR-EC-06687](#) and [privacy policy](#).
- Kahoot: [Privacy policy](#) and [cookie notice](#).

The Commission has limited or no control over these third-party tools. By connecting to these tools during the targeted consultation, the participants consent to the processing of their personal data via a third-party IT tool as described in the related privacy policy.

The use of a third-party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, the Data Controller accepts no responsibility for lack of service due to their downtime.

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 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 your personal data and to rectify them in case your personal data are 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, as explained below.

Insofar you have consented to the certain processing of 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. The withdrawal 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).

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

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 (DG GROW), Unit G.4, at 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-24290.