



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Processing of personal data linked to eInvoicing meetings and events

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 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 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.

This privacy statement explains the reason for the processing of your personal data in the context of a meeting or event organised by the European Commission. It explains 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 the processing of personal data linked to “eInvoicing meetings and events” organised by DG GROW Unit G.4 of the European Commission, is presented below.

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

Purpose of the processing operation: the European Commission collects and further processes your personal data to provide you with information about the specific meeting or event (before, during and after), to process your application for participation in that meeting or event, and to manage your input and contributions for the meeting or event.

Your personal data will not be used for any automated decision-making including profiling.

Live web-streaming and audio-visual recording at the meeting or event of the speakers, organisers and participants, as well as photographs of the speakers and panoramic photographs/screenshots of participants and organisers, may be taken and published on the [Digital Platform](#) (for example at the [eInvoicing User Community](#), or on the [Digital website](#)), or included in the eInvoicing newsletter or other communication materials.

There can be two types of participants: active and silent participants. Active participants are those who are not event speakers but, in accordance with the event format of the meeting or event, participate in the discussion and are therefore part of the audio-visual recording at the event in the same way as a speaker. Silent participants are those who remain silent or choose not to speak during the meeting or event. The audience of silent participants is not recorded, photographed or screenshotted individually or in groups. They may, however, appear on general photos, recordings or screenshots of the event. Please note that you do not need to register as “active” or “silent” participant, this will simply depend on whether you voluntarily choose to speak during the event or not.

Names of speakers may be published on the [Digital Platform](#) (for example on the [eInvoicing User Community](#) or on the [Digital website](#)), or included in the eInvoicing newsletter or other communication materials.

Meetings and events may be organised physically, remotely, or in hybrid format.

Please note that a meeting or event may be held using a third-party videoconference IT service, such as Microsoft Skype for Business, Microsoft Teams or Cisco Webex, which processes personal data. Please read section 7 below for more information.

Participants who do not wish to be part of the above web-streaming and recording/publishing activities have the possibility to object to processing, by sending an e-mail to the organiser prior

or after the event. In case of physical meeting participation, data subjects may be offered the opportunity to sit in back rows that are not recorded/photographed/screenshoted, wear special badges, attend the meeting in a separate room without web-streaming, or other options, depending on the circumstances of the particular meeting. In the case of remote meeting participation, data subjects have the possibility to object to processing by turning off their camera, muting themselves, removing any personal information from their username when accessing third-party videoconference IT services, and not participating in the chat.

During a meeting or event, you may be asked to connect to third-party IT tools which process personal data, such as the ones outlined below. The use of those tools is optional for participants to be engaged in the discussion of the meeting or event.

- [Miro](#): You may be asked to connect to Miro in order to share your ideas, experiences and perspectives related to 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 an event report and/or articles or news items, for example on the [Digital Platform](#) (for example on the [eInvoicing User Community](#) or on the [Digital website](#)), or included in the eInvoicing newsletter or other communication materials. Your identity will not be published together with this information.

During the meeting or event, participants may be asked to take part in polls or quizzes or to give ideas or ask questions to the organisers. Personal data may be collected through the polling tool Sli.do, which has a specific privacy record on the Register of the Data Protection Office (DPO) [DPR-EC-06687](#). This data may be collected either anonymously or answers may be linked to your name. In case information is collected anonymously, the processing of personal data is only to ensure that participants have answered once to the question posed and to recuperate the session should there be technical issues. In case it is not collected anonymously, your name will also be linked to the answer you give which may be shown on the main screen during the meeting or event. The organiser may use this information to collect ideas and ensure that all questions will be followed up after the meeting. Questions or ideas you shared may also be published in the context of the meeting or event on the [eInvoicing User Community](#), the [Digital website](#), or included in the eInvoicing newsletter or other communication materials. Your identity will not be published together with these questions or ideas.

In addition to the processing activities listed above, this also concerns the following processing activities for the organisation, preparation, management, and follow-up of meetings of **ad-hoc expert groups**, such as the eInvoicing Technical Advisory Group:

1. communication activities such as sending e-mails and invitations (this entails the management of contact lists for correspondence);
2. exchange of meeting documents (notably through information sharing and circulation of documents) via e-mail, in dedicated sections of the [Digital Platform](#), such as the [eInvoicing Technical Advisory Group \(TAG\) Wiki section](#), or during events;
3. discussion among the participants in the ad-hoc expert group: in certain cases, the participants in the group need to know each other's names and contact details, so that they can discuss topics on the agenda of the meetings before or after the meetings;
4. publication of meeting minutes and other relevant documentation, including the list of participants, on a dedicated sections of the [Digital Platform](#), such as the [eInvoicing Technical Advisory Group \(TAG\) Wiki section of the eInvoicing User Community](#), for reasons of transparency. The names of participants will only be included in the meeting minutes subject to the prior freely given, specific, informed and unambiguous consent, in compliance with Article 5(1)(d) of Regulation (EU) 2018/1725.

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

The processing operations on personal data, linked to the organisation, management, follow-up and promotion of the meeting or event (including web-streaming, photos, audio-visual recording, screenshots) are necessary for the management and functioning of the Commission, as mandated by the Treaties. Those provisions are in particular, Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union. The processing operations are a part of the Digital Building Blocks activity based on Regulation (EU) No 2021/694.

Consequently, those processing operations 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 or in the exercise of official authority vested in the Union institution or body).

The processing operations on personal data of the speakers for the meeting or event with whom a contract is concluded, are carried out in line with the contractual provisions. Consequently, that processing is necessary and lawful under Article 5(1)(c) of Regulation (EU) 2018/1725 (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract).

Your consent is required for the following actions during the meeting or event (if applicable):

- the processing of your personal data relating to your dietary and/or access requirements;
- the sharing of the participants list containing your name and affiliation with other participants for the purpose of future collaboration;
- the sharing of the attendee list containing your name and affiliation among participants, in order to create working groups to continue the collaborate work launched during the meeting or event;
- the processing of your personal data for inviting you to future events the data controller may organise;
- the processing of your personal data for managing your subscription to a newsletter or other mailing lists of the data controller;
- the processing of your personal data for assisting you with any follow-up activities related to eInvoicing;

- the processing of your personal data to participate in online polls, sharing of questions or ideas or quizzes during the meeting or event using the audience participation tool, Sli.do;
- the publication of your name in case you are a speaker at the meeting or event.

For meetings of an ad-hoc expert group, such as the eInvoicing Technical Advisory Group, your consent is also required for the following actions during the meeting or event (if applicable):

- the processing of your personal data to include your name in the meeting minutes.

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 by ticking the box(es) on the online registration form.

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

- for unsubscribing from the newsletter, please click on the unsubscribe button in any of our newsletters;
- for withdrawing consent that you have provided in order to benefit from other services, please contact the controller of the meeting at EC-DIGITAL-BUILDING-BLOCKS@EC.EUROPA.EU.

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

The following personal data may be processed in the context of the meeting or event:

- contact details (function/title, first name, last name, name of organisation, city, country, e-mail address, telephone number);
- nationality, passport or identity card number and its date of issue and expiry date, date of birth, name, surname, organisation you belong to, gender may be collected, so that the data subjects may obtain access to the premises where the meeting or event is held;
- financial information (such as a payment card number or bank account) may be collected for the payment of fees of the meeting or event or for possible reimbursements;
- signature and audio-visual recording of the meeting, for establishing the attendance list and the minutes;
- personal data processed for audio-visual recording of the participants and organisers (silent participants are not recorded/photographed/screenshoted individually but they may appear on panoramic photographs, recording or screenshots of the whole meeting/audience);
- dietary requests (if any) or specific access requirements;
- opinions or ideas related to eInvoicing that you can voluntarily provide and that may include personal data.

For meetings of ad-hoc expert groups, such as the eInvoicing Technical Advisory Group, in addition the following personal data may be processed:

- personal data included in the minutes of meetings, such as names of meeting participants and their positions expressed.

For meetings of ad-hoc expert groups, such as the eInvoicing Technical Advisory Group, the Data Controller has obtained your personal data either directly from you, via the competent National department, other public entity or organisation that you work for or via the Permanent Representation of your country in Brussels.

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. For each of the categories of personal data that may be processed, please find below the retention details and the reference to the relevant record of processing:

- Personal data related to the organisation and management of the meeting or event (this includes the information given during the registration, before, during or after the event) will be kept for **five years** after the meeting or event.
- Sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting or event, but no later than within **1 month** after the end of the meeting or event.
- Recordings from the web-streamed meeting or event will be kept for **2 years** before being deleted. More information is available in the Record of Processing DPR-EC-00306 (Web-streaming of Commission events).
- Audio-visual recordings that are important for supporting the use and reuse of eInvoicing by current and potential users will be kept for **5 years** after the meeting. All other audio-visual recordings will be kept for **3 months** after the webinar or event before being deleted. More information is available in the Record of Processing DPR-EC-01063 (Meetings and events).
- 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 newsletters or invitations to similar events) 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.
- Selected service providers for organisational purposes (such as caterers, travel agents or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process and protect it from unauthorised access, use and retention.
- Personal data used to enable participants to connect to Sli.do during the meeting is kept for the time necessary to fulfil the purpose of collection or further processing, namely for the length of the on-line meeting. More information is available in the Record of Processing [DPR-EC-06687](#) (Slido - Audience Interaction Software).

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 [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 other 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.

Audio-visual recordings, photographs or screenshots may be published based on public interest (Article 5(1)(a) of Regulation (EU) 2018/1725) as this is part of the organisation, management, follow-up and promotion of the meeting or event. Please note that silent participants are not recorded/photographed/screenshotted individually, but they may appear on panoramic photographs, recordings or screenshots of the whole meeting/audience. Participants that do not wish to be part of these publishing activities have the possibility to object to processing, by sending an e-mail to the organiser prior to the event. In case of physical meeting participation, data subjects may be offered the opportunity to sitting in back rows that are not recorded/photographed/screenshotted, wearing special badges, attending the meeting in a separate room that is not recorded, or other options, depending on the circumstances of the particular meeting. In case of remote meeting participation, data subjects have the possibility to object to processing by turning off their camera, muting themselves, removing any personal information from their username when accessing third party videoconference IT services, and not participating in the chat.

The names of speakers may be published based on consent (Article 5(1)(d) of Regulation (EU) 2018/1725).

The minutes of ad-hoc expert group meetings, such as the eInvoicing Technical Advisory Group meetings, are published on a dedicated sections of the [Digital website](#), such as the [eInvoicing Technical Advisory Group \(TAG\) Wiki section of the eInvoicing User Community](#), and may in some cases contain personal data, as explained under Heading 2 of this privacy statement. These minutes are available to the members of the ad-hoc expert group and the Commission staff involved in organising and managing the meetings of this group. Your name is included in the meeting minutes only subject to your prior freely given, specific, informed and unambiguous consent, in compliance with Article 5(1)(d) of Regulation (EU) 2018/1725.

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).

Registration for the meeting may take place via a Commission website or via 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

Third party IT tools may be used to inform about and promote the meeting or event through widely used communication channels, including the 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.

In order 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 this meeting or event may be held using a third party videoconference IT service such as Microsoft Skype for Business, Microsoft Teams or Cisco Webex. These IT tools have their own cookies and privacy policies (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 into the meeting or event 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 meeting or event, you may be asked to connect to third party IT tools, such as the ones listed below. The use of those tools is optional for participants to be engaged in the discussion of the meeting or event. 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 meeting or event, 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.

Sli.do is a tool that allows audience interactive participation during either **on-line** or **off-line** meetings or conferences. The audience can ask questions, respond to polls, take part in quizzes during a webinar or live event. The tool can be used with any of the Commission's audio-conference tools for on-line events.

In order to reply to questions, event participants can scan a QR code or log into the Sli.do website and enter the conference code. The replies can be anonymous or linked to a person's name depending on the event or meeting. The processing of personal data is to ensure that participants have been able to connect to the software and they are able to reply to the questions only once.

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, 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, as explained below.

Participants that do not wish to be part of the above-mentioned web-streaming and/or recording/publishing activities have the possibility to object to processing, by sending an e-mail to the organiser prior to the event. In case of physical meeting participation, data subjects may be offered the opportunity to sitting in back rows that are not recorded/photographed/screenshoted, wearing special badges, attending the meeting in a separate room without web-streaming, or other options, depending on the circumstances of the particular meeting. In case of remote meeting participation, data subjects have the possibility to object to processing by turning off their camera, muting themselves, removing any personal information from their username when accessing third party videoconference IT services, and not participating in the chat.

If 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 sending an email 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).

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, 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 European 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.