



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Management of eInvoicing Contact points

Data 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 protecting your personal data and to respecting 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 the processing operation “Management of eInvoicing Contact points”, undertaken by the Data Controller, is presented below.

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

The Data Controller collects your personal information to identify the names and contact details of persons (the so-called “contact points”) involved in the development and implementation of policies, programmes and projects related to eInvoicing; to be able to contact you in relation to this policy, programme or project; and, in some cases, upon your agreement, the publication of your personal information (i.e. name, surname, position, and entity or national authority to which you belong or project you are linked to) to facilitate the identification of contact points by citizens, stakeholders or project/programme beneficiaries.

The registration as a contact point may be done via the Commission's online questionnaire tool EUSurvey, which requires you to log in via your ‘EU Login’. ‘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 and the processing operations of ‘EU Login’ (reference number in the public DPO register: [DPR-EC-03187](#)) and ‘EU Survey’ (reference number: [DPR-EC-01488](#)).

Alternatively, the registration may be done by completing and submitting a form published on the [Digital Platform](#). It may also be done by email (e.g. a user working in a national authority reaching out to the Data Controller wanting to be identified as an eInvoicing contact point), as consent requires clear affirmative action, it can be done via a written statement through an email exchange where the Commission includes the privacy statement and the user provides their consent. In certain cases, it may also be done by eInvoicing stakeholders, such as the national authority tasked with the review of an eInvoicing country factsheet¹, who then transfers your personal data to the Data Controller. In

¹ Member States and other countries adopting the European standard on eInvoicing regularly publish and review [eInvoicing country factsheets](#) describing the policy framework, eInvoicing platform, approach for



case an eInvoicing stakeholder, such as a national authority, transfers your personal data so that you may become an eInvoicing contact point, the stakeholder is responsible for ensuring that the transfer of your personal data fulfils the national data protection rules of the stakeholder. In particular, the Commission regards any sharing of personal data of third parties by eInvoicing stakeholders as confirmation that they have ensured this processing to be lawful under Article 6 of Regulation (EU) 2016/679.

In some cases, the European Commission publishes your personal information to facilitate the identification of contact points by citizens, stakeholders or project/programme beneficiaries. This may be the case where you are identified as a contact point involved in the preparation and review of the [eInvoicing country factsheets](#) describing the policy framework, eInvoicing platform, approach for receiving and processing electronic invoices, and other relevant information in each country. It may also be the case when you choose to provide your personal data to be a contact point for a solution that successfully passed the eInvoicing conformance test². Offering contacts with individuals rather than functional mailboxes is often the best and most efficient way to ensure that interested people can get in contact with Commission services or with the relevant contact points (national authorities, stakeholders, etc.).

Your personal data will not be used for an automated decision-making including profiling or for direct marketing

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

Lawfulness of the processing operation:

The Data Controller processes your personal data, because you have given consent to the processing of your personal data for becoming an eInvoicing contact point, which entails being contacted by the Data Controller in relation to your project, programme or policy related to eInvoicing, making your personal data available to third parties upon request and/or publishing your personal data so you can be contacted by interested citizens or other stakeholders (Article 5(1)(d) of Regulation 2018/1725). You can give your consent either by ticking the box in the online registration form or via email.

In case an eInvoicing stakeholder, such as a national authority, transfers your personal data so that you may become an eInvoicing contact point, the stakeholder is responsible for ensuring that the transfer of your personal data is compliant with the national data protection rules of the stakeholder. In particular, the Commission regards any sharing of personal data of third parties by eInvoicing

receiving and processing electronic invoices, and other relevant information in each country. More information is available [here](#).

² eInvoicing offers a test infrastructure that allows solution and service providers as well as public entities to check the compliance of their eInvoicing solution against the standard in a specific syntax: ISO/IEC 19845:2015 (UBL 2.1) or UN/CEFACT CII. eInvoicing provides a ready to use testing platform and supports the users of the eInvoicing Conformance Testing service during the entire testing process. More information is available [here](#).



stakeholders as confirmation that they have ensured this processing to be lawful under Article 6 of Regulation (EU) 2016/679. The user can

Your consent for this purpose can be withdrawn at any time by writing to 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 may process the following categories of personal data:

- Title;
- First name;
- Last name;
- Professional e-mail address;
- Professional postal address;
- Professional phone number
- Position;
- Entity or national authority to which you belong or project you are linked to;
- Professional experience.

In addition, you may have the opportunity to voluntarily provide the following personal data:

- Picture;
- Social media account;
- Signature.

We have obtained your personal data either directly from you or from eInvoicing stakeholders, such as the national authority tasked with the review of the eInvoicing country factsheet.

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 5 years after you ceased to be a contact point.

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?

All personal data provided by you can be accessed by Commission staff and other authorised Commission staff, including intra-muros consultants on a “need to know” basis. Where necessary, the Data Controller may also share your information with service providers for the purpose of managing eInvoicing contact points.

For the purpose of increasing the contact points visibility towards citizens and stakeholders, your personal data may be published on the [Digital Platform](#), for example on the [eInvoicing website](#) or the [space dedicated to the eInvoicing Country factsheets](#). It may also be shared with interested third parties.

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.

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 consented to provide your personal data to the European Commission for the present processing operation. You can withdraw your consent at any time by notifying the controller at EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu. 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. Users can object to the publication of their names by explicitly informing the Data Controller via email or the form published on the [Digital Platform](#) when registering about their desire to keep their personal data from being published on the [Digital Platform](#). In such a case, if there is an interaction such as the contact point validating the



content of an invoicing country factsheet, the Data Controller will keep the personal data anonymous and will change it by a label such as 'MS national public administration representative'.

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 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 legacy notification reference: DPR-EC-24290.