



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 Contact points for DG CONNECT programmes, projects and policies

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

Record reference: DPR-EC-02631

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1. Introduction

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way 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 is in relation to the management of the European Commission List of Trusted Lists (LOTL).

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

Purpose of the processing operation: The European Commission processes your personal information to make available the information notified by the Member States in the LOTL, pursuant to Article 4(3) of Commission Implementing Decision (CID) 2015/1505/EU.

This information is available in an XML document called the List of Trusted Lists (LOTL). The eSignature List of Trusted Lists (LOTL) service is intended for anyone interested in the EU Trust Scheme as defined in the Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC and in particular e-signature implementers interested in handling qualified e-signatures. For the List of Trusted Lists notified information includes electronic certificates of Member States Trusted List Scheme Operators (TLSOs), used to sign their trusted lists. These certificates can contain personal data such as the first name and last name of the signer.

Trusted List Manager is the editing tool which generates machine-processable Trusted Lists in XML and PDF. It also helps Member States to notify the European Commission of changes to their national Trusted List according to Article 4(1) of COMMISSION IMPLEMENTING DECISION (EU) 2015/1505 of 8 September 2015 laying down technical specifications and formats relating to trusted lists pursuant to Article 22(5) of Regulation (EU) No 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market.



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

Lawfulness of the processing operation:

We store and publish your personal data because it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (Article 5(1)(a) of Regulation 2018/1725). The task is that as clarified in Article 4(3) of CID 2015/1505/EU:

“Pursuant to Article 22(4) of Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC, the Commission shall make available to the public, through a secure channel to an authenticated web server, the information referred to in paragraphs 1 and 2, as notified by Member States, in a signed or sealed form suitable for automated processing.”

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

Personal data collected are the ones specified in CID 2015/1505/EU Annex II (5) and notified by Member States on TL Manager: the public key certificates which correspond to the private keys that can be used to sign or seal electronically the form suitable for automated processing of the trusted list and human readable form of the trusted lists.

These public key certificates may contain personal data such as the first name and last name of the signer of the trusted list.

5. How long do we keep your personal data?

All versions of the LOTL (and the contained signing certificates personal data) are kept until a Regulation that would repeal Regulation (EU) No 910/2014 and that would make the usage of LOTL depreciated enters into force, unless such a new Regulation also calls for keeping these lists.

Because previous versions of the LOTL are no longer publicly available when a new version is published, in accordance with Article 13 of the Regulation, all previous versions are kept for statistical purposes in order to:

- Compute statistics on evolution of the number of trust service providers and trust services over time,
- Compute statistics on the evolution of trusted lists quality.

These previous versions are subjected to appropriate safeguards.



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 a Cloud Service Provider, this server being located in the European Union (in Ireland). This excludes the most recent version of the LOTL that is 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 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.

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

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), Unit H4 (CNECT-H4@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>.



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This specific processing operation has been included in the DPO's public register with the following reference: DPR-EC-02631, " Management of contact points for DG CONNECT policies, programmes and projects".