



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

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 is in relation to displaying the personal data contained in national trusted list and in the European Commission List of Trusted Lists (LOTL), pursuant to Article 22(2) and Article 22(4) respectively of 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. These trusted lists, although managed and published by the Member States, are downloaded and displayed by European Commission tools such as the eSignature Trusted List Browser, Trusted List Manager (TL Manager), the EU Trust Services Dashboard, the Pilot for the International Compatibility of Trust Services and the DSS Demonstration WebApp.

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

Purpose of the processing operation: The European Commission publishes your personal information to facilitate the identification of contact points by citizens (e.g. end-users looking for eIDAS trust services), stakeholders (e.g. national Trusted List Scheme Operators) or project/programme beneficiaries. 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.).

The Commission processes your personal data to display, in the Trusted List Browser, TL Manager, the EU Trust Services Dashboard, the Pilot for the International Compatibility of Trust Services and the DSS demonstration WebApp, the information published by Member States in their trusted lists as well as the information published by the European Commission in the LOTL.

The Commission also processes your personal data in the context of trusted lists and LOTL for statistics purposes such as to measure the evolution of the number of trust service providers, trust services and the quality of trusted lists.



The Commission also processes your personal data to provide the Trusted List Manager service to national Trusted List Scheme Operator (TLSO). Trusted List Manager is the editing tool which generates machine-processable trusted lists in XML and PDF.

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 processing operations are necessary pursuant to Article 22(2) and (4) of 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 (eIDAS Regulation). For the personal data contained in the LOTL, data subjects can choose not to have said personal data published in the aforementioned tools.

We do not collect your personal data – it is provided to us through information published by Member States in their trusted list. In accordance with Article 16 of Regulation 2018/1725, when personal data are contained in national trusted lists, it should be noted that:

- Member States are responsible for obtaining the consent of any relevant data subject for this personal data;
- Member States are responsible for informing the data subject(s) that those personal data will be displayed in aforementioned tools;
- Member States are responsible for informing the data subject(s) that they can withdraw their consent relating to the display of their personal information.

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

Personal data collected are:

- The information contained in the LOTL, pursuant to CID 2015/1505/EU Annex II except point (2)(b). This includes public key certificates that may contain personal data such as the first name and last name of the signer of the trusted list.
- The information contained in the national trusted lists (managed and published by Member States), pursuant to Article 22(2) of the eIDAS Regulation. This information may contain personal data that the Member States may publish in their trusted list such as email addresses and public key certificates (may contain personal data such as the first name and last name).

We have obtained your personal data from the LOTL that is managed and published by the European Commission, the national trusted lists that are managed and published by the Member States, and by using the TL Manager service.



5. How long do we keep your personal data?

Trusted lists and LOTL will be published by the Member States and the European Commission until a Regulation that would repeal Regulation (EU) No 910/2014 and that would make the usage of trusted lists and LOTL deprecated enters into force, unless such new Regulation also calls for publications of these lists.

Because previous versions of the trusted lists 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.

Trusted lists and LOTL that are edited via the TL Manager services (these are known as "draft trusted lists and draft LOTL") are deleted three months after the last modification has been made to these draft trusted lists and LOTL.

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 server of a Cloud Service Provider, this server being located in the European Union (in Ireland). 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.

For the purpose of increasing the contact points and ambassadors’ visibility, your personal data are published on the following website:

- TL Manager (restricted access): <https://webgate.ec.europa.eu/tl-manager>
- EU Trust Services Dashboard (also include a version of TL Manager, with restricted access): <https://eidas.ec.europa.eu/efda/home>
- Pilot for the International Compatibility of Trust Services: <https://ec.europa.eu/digital-building-blocks/sites/display/DIGITAL/Pilot+for+the+International+Compatibility+of+Trust+Services>
- DSS Demonstration WebApp: <https://ec.europa.eu/digital-building-blocks/sites/display/DIGITAL/Digital+Signature+Service+-+DSS>

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>.

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".