



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Meetings of the eDelivery Informal Cooperation Network

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

Record reference: [DPR-EC-01063](#)

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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 the **Meetings of the eDelivery Informal Cooperation Network**. It explains 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 in relation to the processing operation **Meetings of the eDelivery Informal Cooperation Network**, undertaken by the European Commission, Directorate-General for Communications Networks, Content and Technology (DG CNECT), Unit H.4, is presented below.

The objective of these meetings is to provide a platform for Member States' representatives involved in the setting up of national eDelivery infrastructures to actively contribute to the adoption of eDelivery at national and EU levels.

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

Purpose of the processing operation: Unit H.4 collects and uses your personal information only for the organisation, preparation, management and follow-up of the meetings of the eDelivery Informal Cooperation Network (ICN). More specifically, this concerns the following processing activities:

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 or in the eDelivery user community¹, the Advanced Gateway to EU Meetings (AGM) online system for meeting organisation (see Record of processing DPR-EC-01141 – Information system supporting the organisation of meetings (former notification DPO-3911)) or CIRCABC (see Record of Processing DPR-EC-01666 – CIRCA and CIRCABC – Global User Directory (former notification DPO-1008))) and sharing of information with other Commission services to follow-up on the meeting concerned;
3. discussion among the participants in the expert group: in certain cases, the participants in the working 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. audio-visual recording of the meetings for the purpose of drafting minutes and publishing the recordings on [PeerTube Video channel videos - EU Video \(europa.eu\)](#) and YouTube [EU DIGIT - YouTube](#) in order to share them with the ICN members.

In case you participate **physically** in the meetings of the eDelivery Informal Cooperation Network, this will also concern the following processing activities:

¹ [Informal Cooperation Network for eDelivery - eDelivery User Community - \(europa.eu\)](#)

5. organisational and administrative activities to ensure the participants' access to Commission premises (see Record of Processing DPR-EC-00655 (Commission Physical Access Control System (PACS)));
6. reimbursement of travel, subsistence costs or payment of special allowances in the sense of Article 21 of Commission decision C(2016) 3301 (see Record of Processing DPR-EC-00301 – Legal Entities and Bank Accounts (former notifications DPO-372 and DPO-300)).

Processing activities **(5)** and **(6)** will **not** take place in case you participate **remotely** in a meeting.

Live web-streaming and audio-visual recording at the meetings of the speakers, organisers and participants, as well as photographs of the speakers and panoramic photographs of participants and organisers might be taken and published on [PeerTube](#) and [YouTube](#) in the context of the eDelivery ICN and embedded on the eDelivery User Community ([Informal Cooperation Network for eDelivery – eDelivery User Community – \(europa.eu\)](#)). Photographs may be used in news or other publications regarding the eDelivery ICN.

The audience or–non-speaker participants are not photographed individually or in groups. They may however appear on panoramic photographs of the whole event/audience.

Participants that do not wish to be part of the above web-streaming and recording/publishing activities have the possibility to object to processing:

- in case of remote meeting participation: by turning off their camera, muting themselves and not participating in the chat;
- in case of physical meeting participation: by sitting in back rows which are not recorded/photographed and wearing special badges.

During the meetings, participants may be asked to take part in polls or quizzes or to give ideas or ask questions to the organisers. Personal data will be collected through the polling tool Sli.do, which has a specific privacy record [DPR-EC-06687](#).

Your name will also be linked to the answer you give which might be shown on the main screen during physical meetings or other type of virtual activities. The organiser may use this information to collect ideas and ensure that all questions will be followed up after the meeting.

The Sli.do results may be published in the context of the meetings at [Informal Cooperation Network for eDelivery – eDelivery User Community – \(europa.eu\)](#) and might be referenced in the communication activities. Your name will not be included in such publications.

During the virtual conference, the organiser may be recording the speakers, including any question and answer sessions or panel discussions. You will be informed by an alert on your screen when the recording is taking place. The recordings will be used for internal purposes to enable accurate minute taking. In addition, they will be published on [PeerTube](#) and [Youtube](#) in the context of the meetings and embedded on the website of the eDelivery User Community ([Informal Cooperation Network for eDelivery – eDelivery User Community – \(europa.eu\)](#)) in order to share them with the ICN members. The links to the recordings will be available only to eDelivery ICN members.

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

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 meetings (including web-streaming, photos, audio-visual recording and the use of video conferencing services) are a part of the Digital Building Blocks activity based on Regulation (EU) No 2021/694 and 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. 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 objective of all processing activities related to Webex is to support the management and the functioning of the European Commission, by adjusting the internal mechanisms and management systems to the new technological environment and advancements, by providing to EC Staff the necessary means and tools to perform their daily tasks and by organizing EC's operations according to the principles of sound financial management. Article 33.1 (a)(b) and (c) of the Regulation 2018/1046 that refers to the performance and principles of economy, efficiency and effectiveness is also applicable here. The use of Webex conferencing services are also in line with the EC's Digital Strategy 2018 for a modern and digital working environment, including unified communication with advanced video-conferencing.

The processing operations on personal data of the speakers for the meetings 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 processing activities:

- the sharing of the meeting participants list containing your name and affiliation with other participants;
- the processing of your personal data for inviting you to future meetings of the eDelivery Informal Cooperation Network;
- the processing of your personal data relating to your dietary requirements and/or access requirements. Please note that this data will only be processed in case you participate **physically** in a meeting;
- the processing of your personal data to participate in online polls, sharing of questions or ideas or quizzes during the meeting using the audience participation tool, Sli.do.

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.

You can withdraw your consent for these services at any time by contacting the controller of the meetings at EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu.

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

The following personal data will be processed:

- Personal data necessary for organising and managing the meetings (gender (Mr/Ms), function/title, first name, last name, name of organisation, city, country, e-mail address, telephone number);
- Personal data processed for audio-visual recording of the speakers, organisers and participants (non-speaker participants are not recorded individually but they may appear on panoramic photographs of the whole event/audience).

In addition, the following data will be processed for **remote** participation in a meeting:

- the following categories of personal data of the participants may be collected: Participant identifiers; Conference Content (available to participants only at Conference duration); Participants' names list (available to participants only at Conference duration); Session identifier (determined by the system, only on anonymised reports); Date of session (determined by user decision, only on anonymised reports)] and audio-visual recordings. In case of web streaming or recording, your photograph image is also considered as personal data. For video-conferencing we use Webex (you can find more information on their processing of personal data in the relevant record [DPR-EC-05006](#)).

In addition, the following data will be processed for **physical** participation in a meeting:

- Personal data necessary for security (access control to Commission premises) such as nationality, ID card/Passport number and its date of issue and expiry date, date of birth, name, surname, organisation he/she belongs to, gender;
- Personal data necessary for reimbursements purposes such as name, means of transport, hotel accommodation and banking details (payment card number or bank account);
- Personal data necessary for payment of special allowances, such as name and banking details (payment card number or bank account);
- Personal data necessary for establishing the attendance list: signature.
- Personal data relating to your dietary requirements and/or access requirements.

We have 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?

Unit H.4 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for a maximum of 5 years after closure of the file to which the personal data processed belongs.

The 'administrative retention period' of five years is based on the retention policy of 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 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 information is without prejudice to different retention periods which may apply to personal data processed for the purpose of reimbursing travel and subsistence costs, payment of special allowances and ensuring the participant's access to Commission premises based on the dedicated processing operations notified to the DPO by the responsible Commission departments ([Records of Processing DPR-EC-00655 \(Commission Physical Access Control System \(PACS\)\)](#) and [DPR-EC-00301 - Legal Entities and Bank Accounts \(former notifications DPO-372 and DPO-300\)](#)).

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, but no later than within **1 month** after the end of the meeting.

Recordings from web-streamed meetings and audio-visual recordings of the meetings will be kept for **5 years** after the meeting before being deleted as the sharing of expert opinions is important for supporting the use and reuse of eDelivery by current and potential users of the building block under the **Digital Europe Programme**.

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)).

When using third party IT services during a virtual conference or event, the European Commission keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for the duration of the conference and for an additional period of up to 5 years in an anonymised format (Conference identifier, start time and duration). You can find more information on the processing of personal data by Webex in the respective Record of Processing [DPR-EC-05006](#). The content of the video/audio conference (documents, links, files etc) will be deleted after the termination of the session.

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 event. 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.

More specifically, the following Commission staff have access to certain parts of the personal data:

- Authorised staff of the European Commission's Directorate-General for Human Resources and Security have access to the personal data necessary for providing access to European Commission premises;
- Authorised staff of the European Commission's Directorate-General for Budget and the Paymaster Office (PMO) have access to the personal data needed for reimbursement purposes and payment of special allowances;
- Authorised staff of the European Commission's Directorate-General for Interpretation (SCIC) as meeting room and equipment providers have access to the audio-visual recordings of the meetings;
- Authorised staff of other European Commission departments involved in the policy follow-up to the meeting of the eDelivery Informal Cooperation.

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 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.

Third Party IT Tools during Video Conferencing

Please note that for hybrid / virtual meetings, a third-party IT service will be used to run the meeting.

When using third party IT services during a virtual conference or event, the European Commission keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for the duration of the conference and for an additional period of up to 5 years in an anonymised format (Conference identifier, start time and duration).

The content of the video/audio conference (documents, links, files etc.) will be deleted after the termination of the session.

The following categories of personal data of the participants are collected in case of **remote** participation in a meeting:

- Participant identifier (mainly email address, but potentially some other parameters)
- Conference Content (available to participants only at Conference duration)
- Participants' names list (available to participants only at Conference duration)
- Session identifier (determined by the system, only on anonymised reports)
- Date of session (determined by user decision, only on anonymised reports)
- Duration of the session (determined by user decision, only on anonymised reports)
- Audio-visual recordings
- Photograph image

The main recipient of the personal data is the conference's organiser who should identify the external participants. The organiser, by service definition, is part of EC staff. Participants are recipients as well of the contents during the duration of the session. The main organiser can take the decision of a local meeting recording, in such scenario a recording alert is shown to all participants.

Sli.do is a tool that allows audience interactive participation during either on-line or live 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.

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).

The registration for the meetings takes place via Advanced Gateway to your Meetings (AGM). 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.

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).

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the meeting/event website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission's control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

International transfers

International data transfers may take place when using a third party IT tool Webex, based on the Record of Processing [DPR-EC-05006](#), in accordance with Regulation (EU) 2018/1725.

Unit H.4 will transfer your personal data to the following recipients in a third country (United Kingdom) in accordance with Regulation (EU) 2018/1725 on the basis of Article 47 of Regulation (EU) 2018/1725 and [Commission implementing decision of 28.06.2021](#) pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom.

Category of Personal Data Datacentre Location:

- Registration Information
 - o Germany (AWS), The Netherlands, the United Kingdom
- Host and Usage Information
 - o Germany (AWS), The Netherlands, the United Kingdom.
- User-Generated Information
 - o Germany (AWS), The Netherlands, the United Kingdom

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 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.

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.

Participants that do not wish to be part of the above-mentioned recording/publishing activities have the possibility to object to processing:

- in case of **remote** meeting participation: by turning off their camera, muting themselves and not participating in the chat;

- in case of **physical** meeting participation: by sitting in the dedicated rows which are not recorded/photographed and by wearing special badges.

For those processing of personal data for which you have given consent (see Heading 3 above), 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. 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, Directorate-General for Communications Networks, Content and Technology (DG CNECT), Unit H.4 (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-01063](#).

ANNEX A: THIRD PARTY IT TOOLS

CISCO WEBEX	
<p>More information on the data processed for the operation of the service can be found in DPR-EC-05006</p>	
<p>CATEGORIES OF PERSONAL DATA PROCESSED</p>	<p>-Host and Usage Information: IP Address, User Agent Identifier, Hardware Type, Operating System Type and Version, Client Version, IP Addresses Along the Network Path, MAC Address of endpoint (as Applicable), Service Version, Actions Taken, Meeting Session Information (title, date and time, frequency, average and actual duration, quantity, quality, network activity, and network connectivity), Number of Meetings, Number of Screen-Sharing and Non- Screen-Sharing Sessions, Number of Participants, Host Name, Screen Resolution, Join Method, Performance, Troubleshooting, and Diagnostics Information</p> <p>- Invoicing information (subset of previous category): Host Name, Conference URL, Conference Time and Duration</p> <p>-Host Registration Information: Name/Surname, Email Address, Password (hashed version only), Public IP Address, Browser, Phone Number (Optional), Mailing Address (Optional), Avatar (Optional), Billing Information</p> <p>-User-generated Information: Meeting and Call Recordings (only local by Organizer) –optional data, Uploaded Files – optional data</p> <p>-TAC Support Information: Name/Surname of the Employee Appointed to Open the Service Request, Email address of the Employee Appointed to Open the Service Request, Phone Number of the Employee Appointed to Open the Service Request, Authentication Information (excluding passwords), Information about the Condition of the System (if applicable), Registry Data About Software Installations and Hardware Configurations (if applicable), Error-Tracking Files (if applicable)</p>

<p>RETENTION PERIOD</p>	<p>-Host and Usage Information: 3 years from when the Service is terminated in a pseudonymised format.</p> <p>-Invoicing information: up to 7 years maximum</p> <p>-Host Registration Information:</p> <ul style="list-style-type: none"> • 7 years after contract termination • On User-request by sending a request to privacy@cisco.com or opening a TAC service request <p>-User-generated Information: Meeting duration (unless local recording by the meeting host takes place)</p> <p>-TAC Support Information: Up to 10 years or on User-request by sending a request to privacy@cisco.com or opening a TAC service request</p> <p>-The chat exchanges between participants are never retained after the termination of the conference.</p> <p>-The list of participants' names is available for each participant for the duration of the conference</p> <p>-If not recorded or otherwise stored, the content of the video/audio conference (documents, links, files etc.) will be deleted after the termination of the session.</p>
<p>STORAGE LOCATION (including International data transfers)</p>	<p>All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission.</p> <p>Personal data will also be transferred to third countries below:</p> <p>-Registration Information: Germany (AWS), The Netherlands, the United Kingdom</p> <p>-Host and Usage Information: Germany (AWS), The Netherlands, the United Kingdom</p> <p>-User-Generated Information: Germany (AWS), The Netherlands, the United Kingdom</p>
<p>THIRD PARTY CONTRACTOR</p>	<p>CISCO International Limited, 1 Callaghan Square Cardiff, CF10 5BT</p>