



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

Processing operation: Stakeholder platform on Confluence

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

Record references: DPR-EC-12428

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

This privacy statement concerns the data processing activities related to the Stakeholder platform on Confluence (hereinafter “Digital community”) administrated by the European Commission’s Directorate-General for Communications Networks, Content and Technology (DG CNECT), Unit H.4.

It explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data. The European institutions are committed to protecting and respecting your privacy. As this service collects and further processes personal data, specific data protection rules apply¹.

Stakeholder platforms on confluence are set up to support the promotion, development and reuse of the DIGITAL Building Blocks. Their purpose is to provide information to the general public or specific stakeholder groups, and to enable the exchange, collaboration and sharing of information between members of a community.

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

We collect and use your personal information to administer the Digital community set up by Unit H.4. Collecting and using your data enables us to establish your membership within the community, to contact you with regard to online and offline activities relating to the community and ensure your participation therein, and to have an overview of the various types of members of the community. This service is provided via the Atlassian Confluence² instance of Digital Europe Platform³.

Depending on the setup of a specific community, participating in a Digital community may enable you to, for example:

- Benefit from easy access to information, tools and services related to a DIGITAL Building Block;
- Post comments in a community;
- Create new discussion topics within a community;
- Contribute to discussion(s) within a community;
- Upload documents to a community;
- Collaborate/interact with other members of a community.

Only registered users can actively contribute to the pages of a community. The particular ways of contribution depend on the setup of a specific community.

Access to some communities may be restricted. In such cases, your contributions will only be

¹ Regulation 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.

² <https://www.atlassian.com/software/confluence>. The central operations of the Atlassian tool stack are covered by record DPREC-05186 in the DPO public register.

³ <https://ec.europa.eu/digital-building-blocks/>

visible to members of that specific community. In case access is not restricted, your contributions will be publicly visible to anyone accessing the community.

To access the Digital community, you must login through EU Login. EU Login requires certain personal data such as the name, surname and e-mail address of the user. Please note that you need to enable two-factor authentication using the EU Login mobile app to access restricted communities and to edit unrestricted communities. For further information, please refer to the privacy statements of 'EU Login' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: [DPR-EC-03187](#)). These data become part of your user account.

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

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

The processing operations on personal data for the organisation and management of the Digital community are lawful under Article 5(1)(d) of Regulation (EU) 2018/1725, as the user provides his/her consent before becoming a member.

You can provide your consent via a clear affirmative act by ticking the box on the online pop-up form.

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

The personal data that is collected depends on whether a user is registered in a community or is accessing it anonymously.

1) Unregistered users

Unregistered users can access a public community anonymously. In this case, only the following **log data** is collected for security measures and no other personal data is processed:

- IP address if not masked;
- User agent;
- Timestamp;
- Targeted resource.

2) Registered users

In case you want to **make contributions** in a community (as outlined in section 2) or **access a restricted community**, Unit H.4 processes personal data necessary for the creation of your account on the website (through EU Login), which allows you to participate in the Digital community, and for the organisation and management of the Digital Community.

In addition to the log data listed above, the following **log data** is collected from users who are authenticated through EU Login:

- User ID.

In order to carry out this processing operation, Unit H.4 collects the necessary following categories of personal data:

- First name and last name (provided through EU Login);

- Email address (provided through EU Login);
- EU Login user name.

Optionally, you can add an avatar or profile picture to your account, or the name of an organisation you are representing.

Registered users of the community can in any case provide additional information, some of which may contain personal data:

- Articles;
- Comments;
- Pictures, text files;
- Links, e.g. to videos.

Please note that the Commission does not request nor expect that participants to the community to include (i) special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) or (ii) personal data related to criminal convictions and offences as provided for in Article 11 of Regulation 2018/1725, related to themselves or to third persons in their contributions to the Communities. Should participants nevertheless volunteer such special categories of personal data, these would be processed on the basis of Article 10(2)(a), that is to say explicit consent of the data subjects. The moderator might decide to delete such personal data on the basis of a case-by-case assessment.

5. How long do we keep your personal data?

Unit H.4 keeps your personal data pertaining to you as a community user (all personal data that is mandatory to create an account) for as long as the support service is provided to you and will be retained for up to 5 years after your last request.

Unit H.4 keeps your personal data pertaining to the community services (such as posted content) for 5 years as of the moment you post content on the stakeholder platform.

Your personal data will be deleted from the platform before the end of the five-year retention period, upon request (see Contact Information in Section 8. below).

Log data is collected the moment you access the community and is deleted after one year.

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 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 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 website's administrators (who are Commission staff) managing the Stakeholder communities, as well as to other staff on a "need to know" basis.

Your data is visible to other members of a community. They can see:

- Your first name and last name;
- Your profile picture (if provided);
- The content of your posts as well as the documents you upload.

In case a community is public, this personal data is visible to anyone accessing the community.

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. Under certain conditions, 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.

As a member of the community, you can modify or delete your personal data in the profile section of the platform. You can also modify or delete your posted content.

As a user, you may also ask the data controller to remove your profile. Your created content on the platform will then be pseudonymised or deleted, at your choice. If pseudonymised, the name of the user will be changed to "unknown unknown", but the content will remain on the community page. Blocking, rectifying or deleting of personal data can be done on request by contacting the data controller at EC-DIGITAL-BUILDING-BLOCKS@ec.europa.eu.

Insofar you have consented to the certain processing of your personal data to the Data Controller for the present processing operation, you can withdraw your consent at any time by notifying the Data 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.

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.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

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 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: <https://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record references: DPR-EC-12428.