



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Processing of personal data linked to Once-Only Technical System (OOTS) Projectathon series from 19 April 2023 to 20 October 2023

Data Controllers: *European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit G3 Digital transformation of industry (hereinafter “DG GROW Unit G.3” or “the Data Controller”)*

Data Processors:

Kereval, 4 rue Hélène Boucher 35235 Thorigné Fouillard, France ; and
IHE-Catalyst, BluePoint, Boulevard Reyers 80, 1030 Brussels, Belgium

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

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1. Introduction

The European Commission (the EC) 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 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 a meeting or event organised by the European Commission. 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 Once-Only Technical System Projectathon is an event where technical teams from the EU Member States connect various systems (hereafter Systems Under Test (SUTs)) under one roof through the Gazelle platform and perform a marathon of peer-to-peer interoperability and compliance tests in a structured environment for several days.

The information in relation to processing of personal data linked to the Once-Only Technical System (OOTS) Projectathon event series, organised by DG GROW Unit G3 of the European Commission, is presented below.

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

Purpose of the processing operation: the European Commission collects and further processes your personal data to provide you with information about the event (before, during and after) and to process your application for participation in that event.

This hybrid event is organised by the European Commission supported by *Integrating the HealthCare (IHE) Catalyst* and *Kereval* and uses the “Gazelle” test management platform. Only registered event participants can access this test platform and parties taking part in it.

The “Gazelle” platform, managed by *Integrating the HealthCare (IHE) Catalyst* and *Kereval*, is a test management tool that manages all the elements necessary for peer-to-peer interoperability tests. It offers a series of tools (validators and simulators) to verify the compliance of messages and documents with specifications or to test the interoperability of an application during a controlled test. The platform originated from the eHealth domain but can be reused in different contexts where peer-to-peer interoperability tests are relevant. Registered participants who are interested in using this tool can access this platform and parties taking part in it. This platform also allows attendees and the organisers to share content and easily connect with each other before, during and after the event.

IHE Catalyst and *Kereval* undertake the responsibility to comply with data protection regulations and in particular with EU regulation 2016/678 of the European Parliament and Council of 27 April 2016 (General Data Protection Regulation) and Regulation (EU) 2018/1725 for the protection of personal data by EU Institutions, agencies, and Bodies.

Participants will be able to register to the Projectathon event by filling in a dedicated event registration form via EU Survey.

Live web-streaming and audio-visual recording at the event will be taking place. The audience or non-speaker participants may be photographed and filmed individually or in groups and may furthermore appear on panoramic photographs and video images of the whole event/audience.

Photographs and video images of the speakers, participants and organisers may be published in the context of the event on Once-Only Hub (website)¹ and on widely used communication channels, including social media. The processing of personal data by Once-Only Hub is covered by the cookie policy of the Commission, available here: https://ec.europa.eu/info/cookies_en and by the privacy policy for the EC-managed websites, available here: https://commission.europa.eu/privacy-policy-websites-managed-european-commission_en.

Please note that this event may be held using a third-party videoconference IT service, such as Microsoft 365 Teams, which processes personal data. Please read section 7 below for more

¹ Available here: <https://ec.europa.eu/once-only-hub>

information.

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

- in case of physical participation, by informing the data controller directly by emailing EC-OOTS@ec.europa.eu; or,
- in case of remote participation, by turning off their camera, muting themselves and using an alias in the chat function in Microsoft Teams.

IHE Catalyst and Kereval act as data processors for the duration of its contract with the European Commission and will delete personal data of the users of Gazelle platform in the context of OOTS Projectathon at the request of the data controller without undue delay.

- After the official registration to the event through EU Survey managed by the European Commission, the participants with a role of vendor admin will receive a link to the Gazelle platform in order to create their account in the tool and register their organisation in Gazelle. The creation of a personal user account will grant participants access to the Gazelle Test Management Application, which gathers information needed for an organisation to participate in a testing session.
- After the organisation is registered, other participants from the same organisation will be able to register as user by creating their account via the “Create an account” button and select their organisation that had been created by the organisation’s vendor admin.
- The vendor admin will receive an email and will need to approve the user account by clicking on the URL in the email. After approval, the user will be able to access the Gazelle platform.
- At this stage, *IHE Catalyst and Kereval* undertake to process personal data for the purpose of delivering the services and in line with the controllers’ documented instructions.
- At the end of the Projectathon series, *IHE Catalyst and Kereval* will delete all the personal data pertaining to the users of the platform in the context of the OOTS Projectathon series.

For the management “the Gazelle platform of this event, *IHE Catalyst* registered in the Crossroads Bank for Enterprises (CBE) under number 0768 585 735, headquartered at BluePoint Brussels, Boulevard Auguste Reyers 80, 1030 Brussels, Belgium, *Kereval* (4 rue Hélène Boucher 35235 Thorigné Fouillard, France, registered in the Registry at the Commercial Court of Rennes under number 442 789 210 RCS Rennes) act as personal data processors.

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 of the OOTS Projectathon event series (including web-streaming and the use of Microsoft 365 Teams as the events platform) 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. In particular, they are necessary to support the implementation of the Once-Only Technical System (OOTS) under the Single Digital Gateway (SDG) Regulation actions in the area of European Digital Government Ecosystem (EDGES), in line with the Digital Europe Work Programme². 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

² Available here: <https://digital-strategy.ec.europa.eu/en/activities/work-programmes-digital>

body).

We process your personal data if you, the data subject, give consent to the processing of your personal data for one or more specific purposes.

Your consent is required for the following actions during the event:

- managing your subscription to the event.
- processing of your personal data for the purpose of using the Gazelle platform in the context of the 2023 OOTS Projectathon series.
- the processing of your personal data relating to your access requirements.
- assisting you with any follow-up activities related to the Once-Only Technical System.
- processing of your personal data for managing your subscription to a newsletter of the data controller.
- processing of your personal data for inviting you to future events the data controller may organise.

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.

Your consent for these services can be withdrawn at any time:

- for unsubscribing from the newsletter, please click on the unsubscribe button in any of our newsletters.
- for withdrawing consent that you have provided in order to benefit from other services, please contact the controller of the event by sending an email to GROW-G3@ec.europa.eu. After your consent is withdrawn all your personal data will be permanently deleted.

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

For your participation in this event and any follow-up activities related to it, you provide us with the following personal data that will be processed:

- contact details (first name(s), last name, email address).
- information on the organisation and Member State you represent and your role during the Projectathon.
- nationality, passport or identity card number and its date of issue and expiry date may be collected, so that you may obtain access to the premises where the Projectathon is held.
- the following categories of personal data of the participants may be collected for the use of Microsoft 365 Teams: 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, your photograph image is also considered as personal data. For videoconferencing we use Microsoft 365 Teams (you can find more information on their processing of personal data in the relevant record [DPR-EC-04966](#)).
- specific access requirements.

The processing operation that takes place during your registration to the event is managed by DG DIGIT Unit B3.

For you to be able to access the Gazelle tool and its features and start peer-to-peer interoperability testing, you provide us with the following personal data that will be processed: contact details (first name, last name, email address, username, organisation name).

In case you will be a contact for your organisation involved in the preparation of the testing session, the following additional personal data will be processed: additional contact details (phone, title (optional), cell phone (optional), fax (optional), professional function).

Depending on your role, you may also be required to provide personal data of the financial contact, marketing contact and technical contact of your organisation. In case you provide any such personal data of third parties, we expect you to fulfil the requirements set forth in the [Regulation \(EU\) 2016/679](#) (General Data Protection Regulation). In particular, we regard any sharing of personal data of third parties by you as confirmation that you have ensured this processing to be lawful under Article 6 of Regulation (EU) 2016/679.

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. For each of the categories of personal data that may be processed, please find below the retention details and the reference to the relevant record of processing:

- Personal data processed for the purpose of the organisation and management of this event (this includes the information given during the registration, before, during or after the Projectathon series) will be kept for **five years** after the event.
- Sensitive personal data relating to 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 Projectathon series, but no later than within **1 month** after the end of the Projectathon series.
- 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 Microsoft 365 Teams in the respective Record of Processing [DPR-EC-04966](#). The content of the video/audio conference (documents, links, files etc) will be deleted after the termination of the session.
- Personal data shared with the controller for future mailing purposes (e.g., for receiving newsletters or invitations to similar events) are processed in line with the Record of Processing [DPR-EC-03928](#) (Management of Subscriptions to Receive Information) and the specific privacy statement prepared by the organising Commission service. Data will be kept until the data subject unsubscribes from the mailing list.
- Personal data processed for the purpose of creation of an account in the Gazelle platform and testing of peer-to-peer interoperability tool in the Gazelle platform will be kept only

for the duration of the 2023 OOTS Projectathon series and will be deleted from the Gazelle platform by the data processor one month after the end of the event series.

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 European Commission servers. The database is stored with Amazon web services, in their database located in Ireland. No personal data is transferred to third countries.

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.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation ('GDPR' - [Regulation \(EU\) 2016/679 and Regulation 2018/1725](#)). The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

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 according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Where necessary, we will also share your information with the service providers (IHE Catalyst and Kereval) for the purposes of organising the event and in order for you to access the Gazelle platform and create an account in it, your information will be accessible to the service providers (IHE Catalyst and Kereval) for the purposes of granting you access to the platform and its features and to enable you to participate in the testing session conducted in the context of the 2023 OOTS Projectathon event series. The service providers can be contacted via the following addresses:

- IHE Catalyst:
 - Online contact form: <https://ihe-catalyst.net/contact-us/>
 - Postal address: IHE-Catalyst, BluePoint, Boulevard Reyers 80, 1030 Brussels, Belgium
 - E-mail: info@ihe-catalyst.net
- Kereval:
 - Online contact form: <https://www.kereval.com/contact-4/>
 - Postal address: 4 rue Hélène Boucher 35235 Thorigné Fouillard, France
 - Email: contact@kereval.com

When users register an account in the Gazelle platform, their personal data will also be disclosed to the vendor admin of their organisation, in order to enable the vendor admin to approve and activate the user's account.

Third Party IT Tools during Video Conferencing

Please note that this meeting or event may be held using a third party videoconference IT service such as Microsoft 365 Teams. This IT tool has its own cookies and privacy policy (available here: Microsoft Teams Commission Record DPR-EC-4966 and Microsoft Privacy Policy) over which the Commission has a limited or no control. By participating into the meeting or event via a videoconference IT tool, the participants consent to the processing of their personal data via the third party tool as described in the related privacy policy.

When using third party IT services during a hybrid 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:

- 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)
- Photograph image

The main recipient of the personal data is the event'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.

MICROSOFT TEAMS	
More information on the data processed for the operation of the service can be found here	
CATEGORIES OF PERSONAL DATA PROCESSED	<p>Identification data: Commission username, email address and account status, user personal data (title, last name, first name), function-related data (DG, unit, office address and telephone number, city, and country)</p> <p>Content data: any content uploaded to the Office 365 platform by its users, such as documents, and multimedia (e.g., video recordings). Additional personal data may be collected and is referred to in paragraph 4 of this privacy statement.</p> <p>Service generated data: contains information related to the data subjects' usage of online services, most notably the user IP address, creation time, site URL and user email address</p> <p>Diagnostic data: is related to the data subjects' usage of office client software.</p>
RETENTION PERIOD	<p>Identification data: for as long as the user account is active.</p> <p>Content data: up to 180 days upon expiration/termination of the subscription</p> <p>Service generated data: six months</p> <p>Diagnostic data: up to five years</p>

STORAGE LOCATION (including international data transfers)	<p>All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission’s Data Centre or in Microsoft datacentres in the EU (linked to the Commission’s Office 365 environment).</p> <p>Identification data: This information is copied to all Office 365 data centres around the globe</p> <p>Service generated data: not necessarily processed outside of the EU. Microsoft is authorised to transfer it to Microsoft Corp., located in the USA, and the network of sub-processors. This type of data contains information on the usage of the service. The data is aggregated before being transferred but may contain identifiable information</p> <p>Diagnostic data: the EC collects Office Diagnostic Data about the client software for its own support purposes in a database hosted in the Commission’s data centre</p>
THIRD PARTY CONTRACTOR	<p>Microsoft Ireland, South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland</p>

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).

For the organisation of the OOTS Projectathon series, the data controller places cookies into your browser during your registration to the event through the EU Survey registration tool and during your registration on the Gazelle platform website, which is subject to its own cookies policy and its own personal data protection privacy statement.

The registration for the OOTS Projectathon takes place via a European Commission tool EUSurvey (DPR-EC-01488). 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.

The collection, aggregation and anonymising operations are performed in the data centre of the European Commission under adequate security measures.

When you visit the website(s) of our OOTS Projectathon event series and and when you fill in the EU Survey in order to register to the event, we will keep the browser history of your visit for a maximum of 3 days. This information will then be deleted. The collection, aggregation and anonymising operations are performed in the data centre of the European Commission under adequate security measures.

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 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.

The European Commission is not responsible for the cookie policy of a third party once you open the Gazelle platform website and start your registration in order to participate to the interoperability tests.

Information about the cookie policies of the processors IHE Catalyst and Kereval can be found below under the following links:

- IHE Catalyst: https://www.ihe-europe.net/data_protection_information
- Kereval: <https://www.kereval.com/legal-notice/>

Third party IT tools, including Social Media

We use third party IT tools to inform about and promote the Projectathon event series through widely used communication channels, including social media. For detailed information about the use of social media by the European Commission, see the Record of Processing [DPR-EC-00073](#) (Social Media Use by the European Commission).

To protect your privacy, our use of third-party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties' specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

The Gazelle platform, managed by *Integrating the HealthCare (IHE) Catalyst* and *Kereval*, is a test management tool, that manages all the elements necessary for peer-to-peer interoperability tests. It offers a series of tools (validators and simulators) to verify the compliance of messages and documents with specifications or to test the interoperability of an application during a controlled test. The platform originated from the eHealth domain but can be reused in different contexts where peer-to-peer interoperability tests are relevant. Registered participants who are interested in using this tool can access this platform and parties taking part in it. This platform also allows attendees and the organisers to share content and easily connect with each other before, during and after the event.

IHE Catalyst and Kereval undertake the responsibility to comply with data protection regulations and in particular with EU regulation 2016/678 of the European Parliament and Council of 27 April 2016 (General Data Protection Regulation) and Regulation (EU) 2018/1725 for the protection of personal data by EU Institutions, agencies, and Bodies.

We recommend that users read the relevant privacy policies of IHE Catalyst ([privacy policy](#)), Kereval ([privacy policy](#)), Microsoft 365 Teams (Record of Processing [DPR-EC-04966](#)), social media content from Twitter ([privacy policy](#)) or LinkedIn ([privacy policy](#)), carefully before using

them. These explain each company's policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

The use of a third-party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

Transfers

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, 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 web-streaming activities have the possibility to object:

- in case of physical participation, by informing the data controller directly by emailing EC-OOTS@ec.europa.eu;
- in case of remote participation, by turning off their camera, muting themselves and using an alias in the chat function.

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 notifying the data controller by email at GROW-G3@ec.europa.eu. The withdrawal of your consent 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.

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 GROW Unit G3 (GROW-G3@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](#).