

Introduction:

When giving suggestions through the “[Have your say: Simplify!](#)” feedback opportunity, the personal data contained in your suggestion will be subject to existing data protection and privacy rules.

When becoming member of the [Fit for Future Platform](#), your personal data will be subject to existing data protection and privacy rules.

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 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 reasons 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.

This privacy statement concerns the processing operation “[Have your say: Simplify!](#)” feedback opportunity and publication of information on Fit for Future Platform website concerning its members (DPR-EC-00154), undertaken by unit SG/A2 “Evaluation and Impact Assessment” of the European Commission (hereafter, ‘Data Controller’), as described below.

Background:

Giving suggestions to the European Commission

As part of the European Commission’s [better regulation agenda](#), you can contribute to the improvement of EU law-making by making suggestions on simplifying and improving ongoing Commission initiatives. You can give suggestions through the “[Have your say: Simplify!](#)” website. Your personal data are not shared with any third party, except if so required by law.

Have your say: Simplify!

The “[Have your say: Simplify!](#)” website enables individuals, businesses and organisations to provide suggestions on how to make EU laws more efficient and effective.

The European Commission examines all suggestions submitted, which then may be used, in particular as part of the Fit for Future Platform’s work, to identify actions that can help simplify laws as part of the Commission’s Regulatory fitness and performance programme (REFIT).

Fit for Future Platform

The European Commission set up the Fit for Future Platform as part of the Regulatory fitness and performance programme on 11 May 2020.

The Fit for Future Platform consists of two groups:

- a Government group composed of representatives of national, regional and local authorities, and of the Committee of the Regions.
- a Stakeholder group composed of representatives of the European Economic and Social Committee and stakeholders representing various interests (business, in particular small and medium-sized enterprises, social partners and civil society organisations).

The Platform assists the European Commission to identify ways to simplify and reduce the regulatory burden of EU law, including through digitalisation.

For this purpose, members of the Fit for Future Platform gather data and evidence and seek stakeholders' and citizens' input in the form of suggestions received through the feedback tool "[Have your say: Simplify!](#)".

The European Commission publishes information on the Fit for Future Platform, including personal data of its members (name, short CVs, photos and meeting attendance lists), to make known the work, composition and achievements of the Platform.

None of the personal data will be used for an automated decision-making including profiling.

Processing your personal data

With regard to "[Have your say: Simplify!](#)" and the [Fit for Future Platform](#), the European Commission, Unit SG/A2 "Evaluation and Impact Assessment" (the data controller), collects and processes personal data:

- to the extent necessary to reply to the suggestions; all correspondence is saved is registered in the Commission's document management system (Ares);
- to publish the suggestions, the respondent's country and, if applicable, the respondent's name, respondent category, organisation name, type and transparency register number on the "[Have your say: Simplify!](#)" website, in the interest of transparency;
- to make known the work, composition and achievements of the Platform.

The processing of personal data is based on the following grounds of lawfulness:

- Personal data are processed for the performance of a task carried out in the public interest (Article 5.1.(a)) of [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, and repealing [Regulation \(EC\) 45/2001](#);

- The legal basis for the “[Have your say: Simplify!](#)” and [Fit for Future Platform](#) processing activities is Article 11 of the Treaty of the European Union and the Commission Decision of 11 May 2020, C(2020) 2977 and paragraphs 19 and 48 of the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on Better Law-Making.
- Personal data are also processed as processing is necessary for compliance with a legal obligation to which the controller is subject, namely the above-mentioned Commission Decision.
- Furthermore, specific processing activities are based on the explicit consent of the data subject, namely:
 - the publication of personal details of submitters of “[Have your say: Simplify!](#)” suggestions (i.e. name of the submitter, respondent category, organisation name and size and transparency register number);
 - The processing of any personal data spontaneously provided as part of the suggestion (free text field);
 - as well as the publication of the name, short CV and picture of every Platform member, in accordance with Article 5.1.(d) of [Regulation \(EU\) 2018/1725](#).

Please do not include any personal data of other individuals in your “[Have your say: Simplify!](#)” suggestion.

Categories of personal data processed

With regard to “[Have your say: Simplify!](#)”, apart from your suggestion we collect the following data:

- first name, surname, language of submission and e-mail in order to be able to reply to you following your suggestion;
- country of origin to better understand the context in which a suggestion is made and whether it is linked to national implementation or enforcement;
- category of respondent as well as, where applicable, organisation name, size and transparency register number, for transparency reasons and for statistical purposes.

To avoid misuse, anonymous feedback is not accepted.

Because of the reasons explained above, all fields are mandatory except the transparency register number.

You furthermore indicate via the online form whether you wish your name, respondent category, organisation name and size and transparency register number to be published. Your suggestion and country of origin will be published for transparency reason even if you indicate you preference for anonymity. Your contact details (e-mail address) are never published.

To make a suggestion in “[Have your say: Simplify!](#)”, users are invited to register via EU Login, the European Commission's Identity Management Service, which will capture and store their personal data. Please refer to the specific EU Login privacy statement and the

processing operation 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: DPR-EC-03187¹) for more information.

With regard to the [Fit for Future Platform](#), several elements may be made publicly available:

- name, short CV and picture of every member;
- Platform meeting minutes: member's name, country name (in the case of the Government group), institution represented (in the case of representatives of the Committee of the Regions and of the European Economic and Social Committee) and attendance at the meeting².

The personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, the European Ombudsman or the European Court of Auditor.

Security of your personal data and accessing and disclosing information

All personal data processed for "[Have your say: Simplify!](#)" and the [Fit for Future Platform](#) are stored on the servers of the European Commission, which complies with the European Commission's security decisions and provisions established by the Directorate of Security for this kind of servers and services. The recipients of information are authorised staff of the European Commission according to the "need to know" principle. Staff providing IT support for the database where all suggestions are saved has access to all information, to the extent needed to carry out their tasks. Suggestions of a more general nature, falling outside the Platform's mandate, may be forwarded to other Commission staff than the Platform's secretariat for them to reply or take note (for further information, please see record of processing DPR-EC-01386 'Dealing with enquiries and correspondence from citizens based on Chapter IV of the Code of Good Administrative Behaviour'). Such staff abide by statutory, and when required, additional confidentiality agreements.

- Information may be forwarded by e-mail to EU staff responsible for replying to your enquiry;
- A "[Have your say: Simplify!](#)" suggestion may be shared with the [Fit for Future Platform](#) for follow-up;

No personal data is shared with any other third party, except if so required by law.

In relation to "Have your say: Simplify!", your suggestion and country of origin will be published on the "Have your say: Simplify!" website as received. The publication of your name, respondent category, organisation name and size and transparency register number depends on your choice as explained above.

In relation to Platform members, the publication of the name, short CV and picture depends on their choice, as explained above.

¹ <https://ec.europa.eu/dpo-register/detail/DPR-EC-03187>.

² Concerning the processing of personal data for the organisation and management of platform meetings, the platform members will receive a separate privacy statement ahead of the meeting.

Verifying, modifying and deleting information

You have specific rights as a ‘data subject’ pursuant to 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.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

For the processing activities based on your consent (see section ‘Processing your personal data’ above), you can withdraw your consent at any time by notifying the data controller. 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, Unit SG/A2 “Evaluation and Impact Assessment” of the European Commission, by using the following email address: SG-F4F@ec.europa.eu

You have the right to lodge a complaint regarding the processing of your data at any time with one of the following:

- the Data Protection Officer (DPO) of the Commission: DATA-PROTECTION-OFFICER@ec.europa.eu,
- the European Data Protection Supervisor (EDPS): edps@edps.europa.eu.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days. The period may be extended by two months where necessary, taking into account the complexity and number of the requests.

Keeping your personal data

Personal data of those who provide suggestions through “Have your say: Simplify!” will be kept until 31 October 2030. After this date, the personal data will be deleted.

The personal data collected through the "Have your say: Simplify!" feedback form is primarily used to support the work of the Fit for Future Platform. However, suggestions relevant for simplification and burden reduction that the Platform does not process for whatever reason, will be considered by the Commission. This will be done as part of its wider efforts to simplify and reduce burdens of EU laws in the framework of the Regulatory Fitness and Performance Programme (REFIT). The suggestions will also be kept published online for statistical purposes. Moreover, all correspondence between the submitters (including their personal data) and the Commission is registered in the Commission's document management system Ares (please see record of processing DPR-EC-00536 Management and short- and medium-term preservation of Commission documents). The retention period applied in this case is 5 years after the end of the Platform's mandate on 31 October 2025. This period is in accordance with the common Commission level retention list for European Commission files (SEC(2019)900).

Commission-level retention list is a regulatory document in the form of a retention schedule that establishes the retention periods and long-term preservation for different types of Commission files. That list has been notified to the European Data Protection Supervisor.

For historical reasons, the personal data of the Platform's members will be kept on the website for five years after the end of the Platform's mandate. After this, it will be deleted.

More detailed information

The Commission's Data Protection Officer publishes a [register](#) of all processing operations on personal data by the European Commission, which have been documented and notified to him.

This specific instance of the processing of personal data has been included in the DPO's public register with the following Record reference: DPR-EC-00154 - "Have your say: Simplify!" feedback opportunity and publication of information on the [Fit for Future Platform](#).

In addition to this privacy statement, this [legal notice](#) also applies.