



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Integrated Library Management System (ILMS)

Data Controller: Publications Office, Unit OP.A.4 "Data, Information and Knowledge Dissemination and Preservation Services"

Record reference: DPR-EC-03730

Table of Contents

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

1. Introduction

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "Integrated Library Management System (ILMS)" undertaken by Unit A.4, "Data, Information and Knowledge Dissemination and Preservation Services" of the Publications Office, is presented below.

The EC Library is a central service for all Commission staff and part of the Publications Office of the European Union (Publications Office). Its mission is to assist Commission staff in quickly and effectively obtaining high-quality background information on a wide range of topics.

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

Purpose of the processing operation: Unit A.4, "Data, Information and Knowledge Dissemination and Preservation Services" of the Publications Office collects and uses your personal information to manage print, electronic, and digital materials in a single interface for the EC Library. Your data are not further processed in a way incompatible with the purpose for which they are collected.

Your personal data are processed in Alma, a cloud-based Integrated Library Management System. Alma allows to load user information extracted from COMREF (staff reference database for Commission information technology systems). It also offers the option to manually edit and delete user information.

The EC Library also has an interface called Find-eR, functioning as a catalogue and discovery service, providing centralized and personalized access to all resources in the network of Commission libraries for the users. The personal data stored in Alma is re-used in Find-eR, and in the EC Data Catalogue, which is a similar interface to Find-eR, but focusing on datasets and databases. In both systems users can create a personalized experience by saving records, queries and search history and ask for library services.

For bibliographic records specific to the EC Data Catalogue, the data stewards (the staff in charge of uploading such bibliographic records) manage data on behalf of others to ensure they can be used effectively. They also name the contact person who is the owner of specific data (data owner). The personal data in this case are the name of the contact person, their e-mail and their role.

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

We process your personal data under Article 5.1 of the Regulation, because:

- 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;

- processing is necessary for compliance with a legal obligation to which the controller is subject;

and

- you as the data subject have given consent to the processing of your personal data for this purpose;

Additional legal basis:

Decision 2009/496/EC, Euratom of the European Parliament, the Council, the Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee and the Committee of the Regions of 26 June 2009 on the organisation and operation of the Publications Office of the European Union, Art. 3(1)(h).

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

In order to carry out this processing operation Unit A.4, "Data, Information and Knowledge Dissemination and Preservation Services" of the Publications Office collects the following categories of personal data:

- General Information: *First name, *Last name, *Primary identifier, *User Group, *Expiration date, *Purge date.
 - Contact Information: *Email types, *Email address, *Preferred email, *Phone types, *Phone number, *Preferred phone number, *Work address details
 - Identifiers: Identifier Type, Value, Note.
 - Blocks: Block description (e.g. loans), Expiry Date, Note.
 - Fines and fees: Fine/Fee type, Comment, Fee owner, Title, Item Barcode, Original amount.
 - Statistics: Statistical Category, Category Type, Note.
 - Attachments: File name, Type, Size, URL, Notes.
 - Proxy: A user may borrow items on behalf of a user that is listed in this field.
 - History: User Audit History.
 - Fulfillment activities: Loans, Returns, Requests
- (*Mandatory field for normal processing operations)

If you are internal to the institution, we have obtained your personal data from COMREF (staff reference database for Commission information technology systems).

When using Find-er, you may also store preferences (e.g. search results and/or alerts) together with a linked email address.

If you are external to the institution, the provision of personal data is mandatory to gain access to the EC Library services.

5. How long do we keep your personal data?

Unit A.4, "Data, Information and Knowledge Dissemination and Preservation Services" of the Publications Office only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for maximum 2 months from the expiration/termination of the access to library services.

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 either on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures in place. 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 authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

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.

If you are internal to the institution, 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.

If you are external to the institution and have consented to provide your personal data to Unit A.4, "Data, Information and Knowledge Dissemination and Preservation Services" of the Publications Office for the present processing operation. 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, 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, Unit A.4, "Data, Information and Knowledge Dissemination and Preservation Services" of the Publications Office (info@publications.europa.eu).

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-03730**.