



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation: TAIEX (Technical Assistance and Information Exchange) Management System (TMS) and; TAIEX (Technical Assistance and Information Exchange) Expert Database (EDB)**

**Data Controller: Directorate General European Neighbourhood Policy and Enlargement Negotiations/ Directorate C/ Institution Building Unit (NEAR C3)**

**Record reference: DPR-EC-01894 for TMS and DPR-EC-00651 for the EDB**

### **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 TAIEX (Technical Assistance and Information Exchange) Management System (TMS) and the TAIEX (Technical Assistance and Information Exchange) Expert Database (EDB), undertaken by Directorate General European Neighbourhood Policy and Enlargement Negotiations/ Directorate C/ Institution Building Unit (NEAR C3) is presented below.

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

Purpose of the processing operation: The Institution Building Unit (IBU) collects and uses your personal information in order to organise in the main TAIEX workshops, expert missions and study visits. Personal data are collected and processed through the TMS, which is an operating system designed to facilitate the organisation of TAIEX events, separate but complimentary to the EDB. The tasks undertaken imply dealing with invitations, participants, experts, reports, publications, logistical arrangements and for the establishment of appropriate budgets for the payment for flights, accommodation, conference facilities and allowances. In support of TAIEX operations the management of contact lists of TAIEX National Contact Points (NCPs), the permanent representation to the European Union of beneficiaries of the Enlargement and Neighbourhood Instruments and TAIEX Member State (MS) NCPs for liaison and information sharing, and EU colleagues involved in the assessment of the requests for assistance is also undertaken.

The purpose of the processing of personal data in relation to the EDB is that in order to meet the requests for TAIEX events, the IBU relies in the main on MS Public Sector Experts, and on an exceptional basis (in cases where the expertise cannot be found in the public sector), on Private Sector Experts from a MS. The EDB therefore acts as a repository of information about MS Public Sector Experts and Institutional CPs.

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 and management of these TAIEX activities are carried out within the mandate of the TAIEX instrument on the basis of the following legislation:

Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11.3.2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action.

Regulation (EU) No 231/2014 of the European Parliament and of the Council of 11.3.2014 establishing an Instrument for Pre-accession Assistance (IPA II).

Regulation (EU) No 232/2014 of the European Parliament and of the Council of 11.3.2014 establishing a European Neighbourhood Instrument.

Council Regulation (EC) No 389/2006 of 27.2.2006 establishing an instrument of financial support for encouraging the economic development of the Turkish Cypriot community and amending Council Regulation(EC) No 2667/2000 on the European Agency for Reconstruction and Regulation (EU) 2017/825 of the European Parliament and of the Council of 17 May 2017 on the establishment of the Structural Reform Support Programme for the period 2017 to 2020 and amending Regulations (EU) No 1303/2013 and (EU) No 1305/2013 - implemented through -:  
Service Level Agreement (SLA) between the SRSS and DG NEAR concerning the Technical Assistance and Information Exchange (TAIEX) support to the Turkish Cypriot community and Member States.

Regulation (EU) No 234/2014 of the European Parliament and of the Council of 11.3.2014 establishing a Partnership Instrument for cooperation with third countries - implemented through -:

SLA between FPI and DG NEAR concerning the Technical Assistance and Information Exchange (TAIEX) support to third countries, regions and territories eligible for measures supported by the Partnership Instrument.

Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17.12.2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No1083/2006; Regulation (EU) No 1304/2013 of the European Parliament and of the Council of 17.12.2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006 - implemented through -:

SLA between DG Regional and Urban Policy and DG Neighbourhood and Enlargement Negotiations on the implementation of a cross-subdelegation between the two Directorates-General concerning TAIEX support to Member States.

Commission Decision COM (2017) 63 Final. "The Environmental Implementation Review: Common challenges and how to combine efforts to deliver better results" - implemented through -:

SLA between DG Environment and DG NEAR concerning the Technical Assistance and Information Exchange (TAIEX) support to Member States.

Commission Decision C(2019)7438 Final on the financing of the annual work programme relating to coordination and promotion of awareness on development issues for 2019 - implemented through -:

SLA between DG DEVCO and DG NEAR concerning the Technical Assistance and Information Exchange (TAIEX) and Twinning support to third countries, regions and territories eligible for measures supported by DG DEVCO.

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 processing operations on personal data of the speakers (private experts), 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)

In addition, for some limited processing activities, the processing operations are lawful under Article 5(1)(d) of Regulation (EU) 2018/1725 (the data subject has given consent to the processing of his or her personal data for one or more specific purposes)

Your consent is required for:

- the processing of your personal data relating to your dietary requirements and/or access requirements, if collected;
- the sharing of the event (TAIEX workshops, expert missions and study visits) agenda which may contain your name and designation and which may be published on the TAIEX website;
- including your name and designation on the attendee list;

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.

#### **4. Which personal data do we collect and further process**

In order to carry out this processing operation the Institution Building Unit collects the following categories of personal data:

1) The EC Desk Officer, the relevant Directorate-General Contact Point and the relevant IBU staff member(s) are required to provide their First Name; Family Name and Email.

2) Participants in TAIEX events.

All participants included in the "Registration Tool" are requested to provide the following data – Formal Title ; First Name ; Family Name ; Institution Name ; Street 1 ; Postal Code ; City ; Country ; Email ; and Telephone.

In cases where an "accommodation/travel list" is provided, participants are requested to provide the following data -

Family Name ; First Name ; City ; Distance from City to venue ; Check in Date ; Check Out Date ; Flight Requested Y/N ; Preferred Airport ; Car Y/N ; Public Transport Y/N ; and Comment.

For Study Visits where participant registration forms are utilised, the following data is requested – Country ; Title ; First Name ; Family Name ; Institution Name ; Department ; Function ; Office Address ; Post Code / City ; Office Telephone ; Office Fax ; Mobile Phone ; Email ; Preferred method of Travel and Airport of Departure ; and Request for a Hotel Y / N.

In cases where a flight is booked for a participant the provision of a copy of the passport (name and passport number only) may also be requested in order to ensure that the name on the passport is exactly the same as the name on the flight ticket.

When events are organised in Commission buildings either the passport number or an Identity card number is required to be provided (for the participants to gain access to Commission buildings, personal data are shared with the Directorate-General for Human Resources and Security of the European Commission - more information is available in the Record of Processing DPR-EC-00655 (Commission Physical Access Control System (PACS))).

3) For the LCO and the authorised representatives of the beneficiary institution requesting the assistance (unless they are included on the Registration Tool).

The local co-organiser and the Authorised representatives are requested to provide the following data:-

Formal Title ; First Name ; Family Name ; Institution Name ; Function ; Office Address ; Postal Code ; City ; Country ; Telephone and Email.

4) Experts and host institution representatives in TAIEX events.

Experts are requested to provide the following information through the link they are sent by the IBU processor –

Country ; Title ; First Name ; Family Name ; Institution Name ; Department ; Function ; Office Address ; Post Code / City ; Office Telephone ; Office Fax ; Mobile Phone ; Email ; Bank Details; Name / Address of Bank ; Name of beneficiary account holder ; IBAN code ; and SWIFT/BIC code ; Preferred method of Travel and Airport of Departure ; and Request for a Hotel Y / N.

In cases where a flight is booked for a expert the provision of a copy of the passport (name and passport number only) may also be requested in order to ensure that the name on the passport is exactly the same as the name on the flight ticket.

When events are organised in Commission buildings either the passport number or an Identity card number is required to be provided (for the expert to gain access to Commission buildings, personal data are shared with the Directorate-General for Human Resources and Security of the European Commission - more information is available in the Record of Processing DPR-EC-00655 (Commission Physical Access Control System (PACS)).

Public experts who are not already registered in the EDB can include their personal data on the EDB at the same time (or later) through the same link they are sent to register on an event. They may at this time also register as an ICP.

Host institution representatives are requested to provide the following –

Country ; Title ; First Name ; Family Name ; Institution Name ; Department ; Function ; Office Address ; Post Code / City ; Office Telephone ; Office Fax ; Mobile Phone ; Email ; also if applicable – Bank Details; Name / Address of Bank ; Name of beneficiary account holder ; IBAN code ; and SWIFT/BIC code.

5) TAIEX CP's in EU Member States, beneficiaries or international organisations and the permanent representation to the EU of beneficiaries of the Enlargement and Neighbourhood Instruments.

Persons in this grouping are requested to provide the following –

Country ; Category ; Surname ; First Name ; Email ; Telephone/fax and Institution/Address.

In cases where a flight is booked for a participant the provision of a copy of the passport may also be requested in order to ensure that the name on the passport is exactly the same as the name on the flight ticket. When events are organised in Commission buildings either the passport number or an Identity card number is required to be provided.

6) Photos / pictures, presentations, live web streaming and or audio and video recordings

Photos / pictures, presentations, live web streaming and or audio and video recordings of TAIEX events may be taken or made.

The chairperson of the TAIEX event is asked to advise all persons attending the event that photographs/pictures should only be taken during a set period of time to allow those persons who do not agree to have their photograph taken to leave the room.

In the case of live web streaming and video recording, the alternative to the participants attending the event is to provide them with the opportunity to watch the live web streaming or the opportunity to watch the video of the event.

The provision of personal data is required so as to ensure that the arrangements for the TAIEX event can be undertaken. If you do not provide your personal data, possible consequences are that the Institution Building Unit will not be able to make any arrangements for you to attend the workshop, expert mission or study visit. The data that we collect is provided directly by yourself or with your permission through either the Local Co organiser or the National Contact Point.

#### **5. How long do we keep your personal data?**

The Institution Building Unit only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. The personal data of all attendees of a TAIEX event which includes the participants and experts as well as the representative of the Host Institution in the case of study visits, and the authorised representatives of the beneficiary institution will be held on the TMS for a period of 6 years to allow for historical, statistical and reference purposes. The personal data of suppliers and institutions (including natural persons) uploaded to the TMS by the Commission's service provider will be treated in the same manner irrespective of whether they were remunerated or not. Photos / pictures, presentations, live web streaming and/or audio and video recording of experts and participants will be treated in the same manner. The agreed agenda is saved on the TMS and may include the names of the expert speakers, local speakers and the persons chairing the event. Copies of this are issued to each participant and are also made available on the TAIEX website. Presentations made in workshops will be saved on the TMS and will be published on the TAIEX website and may include personal data of the expert who undertook the presentation. Following this period of time the personal data will be encrypted.

The decoding of these files will require the agreement of the Data Controller and each request will be logged. In cases where the Data Controller agrees the personal data will be decoded for use by the requesting person or organisation. Prior to the data being re-encrypted a copy of the relevant part of the log will be added to the decoded file, prior to being re-encrypted. The data will be transferred to the archives of DG NEAR for a period of ten years following their delivery to the Document Management Office. The date of delivery to the archives is dependent on the date of closure (including the period of grace to conclude all outstanding transactions) of the contract with the IBU's service provider as regulated by the Commission's Financial Regulations. Following this period the files containing the data will be deleted. In cases where the period of 6 years to allow for historical, statistical and reference purposes has not been reached, a copy of the relevant TAIEX events will be retained on the TMS until the end of the 6 year period. These files will be transferred annually to the archives, on the anniversary of the closure of the contract with the service provider.

The personal data of experts and ICPs registered on the TED should be updated by the expert or the ICP themselves on an annual basis so that they remain up to date. The registration will become inactive after a period of 2 years from the date of registration, or from the last update of the registration, or from the last date that the expert or ICP was included on a TAIEX event, whichever is the latest. In cases where the data becomes inactive, the data will be moved to an inactive file and deleted one year later. While the registration is active the data will be retained in the TED and will be utilised for TAIEX events irrespective of the contracted service provider.

The personal data of TAIEX CP's in EU Member States, beneficiaries or international organisations and the permanent representation to the EU of beneficiaries of the Enlargement and Neighbourhood Instruments will be retained in the TMS and will be utilised for TAIEX events irrespective of the contracted service provider, until such time as the IBU is advised that the person has been replaced by another person. The personal data of the replaced person will then be deleted from the TMS. In cases where the person has been consulted in relation to an event this information will have been saved to the event files and will be retained as part of the event on the TMS as detailed above.

Any personal data relating to dietary requirements, accessibility, etc. provided by a participant or expert will be deleted one month after the end of the event.

Personal data collected to issue badges in order for the data subjects to gain access to Commission buildings will be deleted 6 months after the end of the event as per the Data Processing Record DPR-EC-00655 related to the Commission Physical Access Control System (PACS).

#### **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 [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?**

- EC staff responsible for TAIEX and colleagues acting as participants and speakers on TAIEX events;
- Service providers for organisational purposes (such as caterers, travel agents or event management organisations) who are contractually bound to process personal data on behalf of and in line with the instructions of the controller, have to keep confidential any data they process and protect it from unauthorised access, use and retention.
- Participants attending an event;
- the Local Co-organiser;
- the TAIEX national contact points in the beneficiary/partner countries and
- sub-contractors and providers of services contracted for an event
- Public authority recipients include Member State National Contact Points and MS experts attending events.

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. All staff in IBU-TAIEX have full access rights to the data in the TMS. The data in the TMS may be made available to other Commission Services and EU institutions in line with Regulation (EU) 2018/1725. Extracts of the information contained in the TMS may be made available to MS Administrations and experts attending events in line with Article 9 of Regulation (EU) 2018/1725.

Staff in the Service provider contracted by the EC to undertake the logistical aspects of TAIEX events are provided read only access to the data uploaded by the IBU processors in line with Article 9 of Regulation (EU) 2018/1725. In relation to the logistical aspects they have full access rights (read, write and update).

The participants attending an event; the Local Co-organiser in the beneficiary institution; the TAIEX national contact points in the beneficiary/partner countries and sub contractors and providers of services contracted for an event will be provided with event specific information which will include personal data, in line with Article 50 of Regulation (EU) 2018/1725.

The names of all participants and experts are included on a signing in attendance list which needs to be signed by the participant or expert as relevant. The photographing or copying of the list is prohibited. For any persons who do not wish to have their names included on the list, alternative arrangements may be put in place; affected persons should inform the TAIEX Project Officer at the time of registration or before the preparations of the event have been concluded

The publication of personal data is made under the following conditions. The chairperson of the TAIEX event is asked to advise all persons attending the event that photographs/pictures should only be taken during a set period of time to allow those persons who do not agree to have their photograph taken to leave the room; unless all of the attendees agree to having their photograph taken. In the case of live web streaming and video recording, the alternative to the participants attending the event is to provide them with the opportunity to watch the live web streaming or the opportunity to watch the video of the event.

Please note that you assume full responsibility for the collection and or publication of pictures, audio visual recordings and/or for any other processing of personal data that you might carry out during the event at your own initiative.

Experts are advised that the presentations made at workshops are made available to a wider audience through the TAIEX Website. Participant and experts are also advised the agenda of events which may include the name of both participants and experts is also made available through the TAIEX website. Participants who do not wish to have their name included on the agenda should inform the TAIEX Project Officer at the time of registration or before the preparations of the event have been concluded.

The controller will transfer your personal data to countries which are beneficiaries of TAIEX assistance as per the relevant EU Legislation and Service Level Agreements entered into with other Directorate Generals and Services in line with Regulation (EU) 2018/1725.

The TAIEX mandate to provide assistance covers:

- Turkey, North Macedonia, Montenegro, Serbia, Albania, Bosnia and Herzegovina and Kosovo\*;
- Turkish Cypriot community in the northern part of Cyprus;
- Algeria, Armenia, Azerbaijan, Belarus, Egypt, Georgia, Israel, Jordan, Lebanon, Libya, Moldova, Morocco, Palestine\*\*, Syria, Tunisia and Ukraine.



- All countries covered by the Partnership Instrument and the mandate of Directorate General for Development Cooperation.

*\* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.*

*\*\* This designation shall not be construed as recognition of a State of Palestine and is without prejudice to the individual positions of the Member States on this issue.*

The controller will transfer your personal data based on Article 50(1) of Regulation (EU) 2018/1725:

(c) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject, between the controller and another natural or legal person.

(d) The transfer is necessary for important reasons of public interest

Please note that pursuant to Article 3(13) of the 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 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<sup>1</sup> 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) on grounds relating to your particular situation.

You have consented to provide or you have authorised the Local Co-organiser or the national Contact Point to provide your personal data to the Institution Building Unit 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.

---

<sup>1</sup> In certain circumstances, it is necessary to reconcile the rights of data subjects pursuant to Regulation (EU) 2018/1725 of the European Parliament and of the Council with the needs of investigations and confidentiality of exchanges of information with the competent public authorities, as well as with full respect for fundamental rights and freedoms of other data subjects. To that effect, Article 25 of that Regulation provides with the possibility to restrict the application of Articles 14 to 22, 35 and 36, as well as Article 4 thereof, insofar as its provisions correspond to the rights and obligations provided for in Articles 14 to 22. Commission Decision (EU) 2018/1962 of 11 December 2018 laying down internal rules concerning the processing of personal data by the European Anti-Fraud Office (OLAF) in relation to the provision of information to data subjects and the restriction of certain of their rights in accordance with Article 25 of Regulation (EU) 2018/1725 of the European Parliament and of the Council C/2018/8654 (OJ L 315, 12.12.2018, p. 41) encompasses the processing of personal data contained in information which the Commission's services are required to transmit to OLAF. Where Commission services processes personal data in instances referred to in Article 1(3) of the Commission Decision (EU) 2018/1962, they may, where necessary, apply restrictions in accordance with this decision. To that end, they shall consult OLAF, unless it is clear to the Commission service or executive agency concerned that the application of a restriction is justified under this decision.

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:

Directorate General European Neighbourhood Policy and Enlargement Negotiations/  
Directorate C/ Institution Building Unit (NEAR C3): ([NEAR-TAIEX@ec.europa.eu](mailto:NEAR-TAIEX@ec.europa.eu))

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto: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](mailto: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-01894 for TMS and DPR-EC-00651 for the EDB**