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# Model Privacy Statement for Meetings and Events organised by the European Commission

***NB: TEXT IN RED AIMS TO GUIDE YOU THROUGH THE DOCUMENT AND SHALL BE DELETED***

*THE TEXT IN RED PROVIDES YOU WITH GUIDANCE ON HOW TO FILL IN THIS TEMPLATE. IT SERVES TO REMIND YOU OF THE LEGAL OBLIGATIONS RELATED TO YOUR ROLE AS DATA CONTROLLER, AS WELL AS TO HELP YOU ADAPT THE STANDARD TEXT SO THAT THE INFORMATION CONTAINED IN THE PRIVACY STATEMENT IS EXTENSIVE AND CORRESPONDS TO THE PARTICULARITIES OF THE RELEVANT PROCESSING OPERATION. AFTER YOU HAVE COMPLETED THE DRAFTING OF THE PRIVACY STATEMENT, YOU SHOULD ERASE THE GUIDANCE TEXT AND MAKE SURE THAT IT DOES NOT APPEAR IN THE FINAL VERSION THAT YOU WILL PROVIDE TO THE DATA SUBJECTS.*

*As data controller, you are reminded about your obligations in relation to* [*Regulation (EU) 2018/1725*](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.295.01.0039.01.ENG&toc=OJ:L:2018:295:TOC) *(‘the Regulation’). In particular vis-a-vis the data subjects you need to:*

* *take appropriate measures to provide any information and any communication to the data subjects in a clear, easily understandable, transparent and concise form, as well as* ***facilitate for the data subjects to the exercise his or her rights*** *as indicated in article 14 of the Regulation;*
* *to* ***provide the data subjects with all the necessary information*** *as described in Articles 15 and 16 of the Regulation in order to ensure a fair and transparent processing. You must ensure this information is provided to the data subjects at the very beginning of the processing of their personal data.*

*Therefore,* ***make the privacy statement available to the data subjects at the outset*** *when you collect the data directly from them (Article 15). When the data are not collected directly from the data subjects (Article 16), you must ensure that the privacy statement is provided to them within the time period specified in Article 16.3(a)-(c).*

*It is crucial that you make the privacy statement visible and easily accessible to the data subjects. It should be provided in the most appropriate format and place (e.g. published on the relevant website, provided as part of the online form that the data subjects have to fill in, or in the acknowledgment of receipt when a data subject exercises his/her rights via an email, etc.). You should also ensure that the data subjects are adequately directed towards the privacy statements location in order to become aware of it.*

*Note also that the information in the privacy statement must be consistent with the relevant sections of the record of the processing operation* *in the Data Protection Records Management System (DPMS). Please verify that the information contained in both documents is the same before submitting the record and privacy statement.*

**PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** *[Name of the (type of a) meeting or event]*

**Data Controller:** European Commission, Directorate-General for International Partnerships, *Full name of Directorate/ unit responsible (entity)]*

**Record reference:** DPR-EC-1063

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**1. Introduction**

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](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.295.01.0039.01.ENG&toc=OJ:L:2018:295:TOC) 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 *[Name of the (type of a) meeting or event]* undertaken byDirectorate-General for International Partnerships, *Full name of Directorate/ unit responsible, i.e. the organisational entity* (hereafter ‘the controller’). 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.

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

Purpose of the processing operation: The controller collects and further processes your personal data to provide you with information about the *[meeting or event]* (before, during and after) and to process your application for participation therein.

*[If using web-streaming/official photo-/videographers, add the following paragraph]*

Live web-streaming and audio-visual recording of the speakers, organisers and participants, as well as photographs of the speakers and panoramic photographs of participants and organisers will be taken and published in the context of the *[event or meeting]* at *[the data controller should indicate where the information will be published, eg INTPA website]*.

The audience or non-speaker participants are not photographed individually or in groups. They may however appear on panoramic photographs of the whole event/audience. ( !Ensure to implement this in practice! Otherwise you need to ask peoples’ explicit consent and mention this under section 3 below, see options there)

Participants that do not wish to be part of the above web-streaming and recording/publishing activities have the possibility to object to processing. *[Please specify how they can object (e.g. by sitting in back rows which are not recorded/photographed, by providing special badges, by offering a separate room without web-streaming, etc.). Please make sure to inform the participants of the possibility to object to processing and guide them on how to request it (e.g. by sending an e-mail to the organiser prior to the event).]*

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 *[meeting or event]* (including web-streaming, photos, audio-visual recording) are necessary for the management and functioning of the Commission, as mandated by the Treaties. Those provisions are in particular, [if applicable, the controller should indicate the specific legal basis for their meeting/event, and] Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union. 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 data controller should note: for internal Commission meetings (of Commission staff only) and working meetings of Commission staff with the staff of other EU institutions and bodies and Member States (which are not comitology or expert (group) meetings), all processing could, in principle, be based on Article 5(1)(a) of Regulation (EU) 2018/1725 (including mailing lists, sending of invitations/information, sharing of attendee lists internally, etc.).*

*[If the controller has concluded a contract with the speakers for the meeting/event, it should indicate the following:*

The processing operations on personal data of the speakers 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).*]*

*[For meetings with external participants (which are not comitology or expert (group) meetings nor other working meetings of Commission staff with the staff of other EU institutions and bodies and Member States), the controller has to obtain consent for the processing operations indicated below.*

*In the privacy statement, the controller should add only possibilities relevant for their meeting/event – all options not applicable shall be deleted.]*

 *[the controller should indicate as appropriate or add additional possibilities; if you chose one of the below options you need to give people the possibility to explicitly declare their consent,* ***e.g. adding a tick box to the (online) registration form****; you need to keep a proof of the given consent.*

*Exemple: if you wish to share participants lists among participants, you need to chose the corresponding option below to inform people about it AND offer people the possibility to explicitly agree with this, e.g. by adding a tick box to the registration form ‘Yes, I agree that my name can be included on the participants list to be shared with other participants’ This tck ox can not be pre-ticked! :]*

Your consent is required for:

* the processing of your personal data relating to your dietary requirements and/or access requirements;
* the sharing of the participants’ list containing your name and affiliation with other participants *[the data controller should indicate if there are specific purposes for such sharing, e.g. for the purpose of future collaboration of certain participants]*;
* the sharing of the meeting/event attendee list containing your name and affiliation among participants, in order to create working groups to continue the collaborate work launched during the meeting/event;
* the processing of your personal data for inviting you to future events the data controllermay organise;
* the processing of your personal data for managing your subscription to a newsletter of the data controller.

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 [delete if not applicable]:

* for unsubscribing from the newsletter, please *[click on the unsubscribe button [the data controller should indicate where] OR send an email to [the data controller should indicate the relevant functional mailbox]];*
* for withdrawing consent that you have provided in order to benefit from other services, please contact the controller of the meeting/event at *[the data controller should indicate the relevant contact point]*.

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

*[The information in the first bullet point is standard information that is usually collected. However, the controller should adapt it and indicate only relevant categories. Reminder: only collect necessary data (‘data minimisation principle’)! The other bullets suggested can be added and completed if necessary.]*

The following personal data will be processed:

* contact details (function/title, first name, last name, name of organisation, city, country, e-mail address, telephone number);
* *[nationality, passport or identity card number and its date of issue and expiry date may be collected, so that the data subjects may obtain access to the premises where the meeting/event is held]*;
* *[financial information (such as a payment card number or bank account) may be collected for the payment of fees of the meeting/event or for possible reimbursements];*
* *[dietary requests (if any) or specific access requirements]*.

**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 is processed, please find below the retention details and the reference to the relevant record of processing *[the data controller should indicate only the relevant categories, all other bullet points can be deleted]*:

* All personal data related to the organisation and management of the *[meeting or event]* (this includes the information given during the registration, before, during or after the event) will be deleted **one year** after the last action in relation to the *[meeting or event]*.
* Sensitive personal data relating to dietary and/or 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 *[meeting or event]*, but no later than within **1 month** after the end of the *[meeting or event]*.
* Recordings from the web-streamed *[meeting or event]* will be kept for **2 years** before being deleted. More information is available in the Record of Processing DPR-EC-00306 (Web-streaming of Commission events).
* In case of audio-visual recording of the *[meeting or event]*, the recordings will be kept for **3 months** after the *[meeting or event]* before being deleted. More information is available in the Record of Processing DPR-EC-01937 (Audio-visual recording of meetings).
* 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)).
* 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 *[the data controller should indicate the relevant record:* DPR-EC-00xxx on Management of subscriptions to receive information].
* Selected service providers for organisational purposes (such as caterers, travel agents or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process and protect it from unauthorised access, use and retention.

**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 contractor [include contractor name]*  *[only include reference to contractors in the event a contractor exists, otherwise erase the reference]].* All processing operations are carried out pursuant to [Commission Decision (EU, Euratom) 2017/46](https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1548093747090&uri=CELEX:32017D0046) 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 personal data on behalf of the Commission, [and by the confidentiality obligations deriving from the General Data Protection Regulation (‘GDPR’ - [Regulation (EU) 2016/679](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32016R0679)*) [include this part of the sentence only in the event that a contractor exists and is bound by the GDPR]].*

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.

If people submit personal data through a website (e.g. registration forms), make arrangements for the implementation of encrypted HTTPS connections and ensure that all personal data is submitted via secure HTTPS connections.

**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.

*[If the controller uses (a) processor(s) for the organisation of a meeting/event:*

Where necessary, we may also share your information with service providers for the purposes of organising the *[meeting/event]*:

*Service provider 1: [Name and address of the service provider]*

*Service provider 2:]*

*[If the controller foresees the publication of any personal data, e.g. on Internet or social media, you should inform people about this and specify to what extent you would publish personal data and the legal basis for it (e.g. consent).]*

**Cookies** *[only add* and adapt *if applicable, otherwise delete this section]*

* If you –or our contractor- collect data through online forms, ensure that there are no tracking cookies (e.g. no use of google analytic tracking cookies) or social media plug-ins that collect personal data (e.g. no facebook ‘like’ button tracking users).
* Ensure that all websites respect the “do not track” browser settings.
* Furthermore, if setting of cookies leads to processing of personal data, people need to be informed and consent to this. For further information, see [EDPS Guidelines of 7 November 2016 on the protection of personal data processed through web services provided by EU institutions](https://edps.europa.eu/data-protection/our-work/publications/guidelines/web-services_en), namely section 4;
* make sure that all websites respect the “do not track” browser settings;
* if people submit personal data on the website (eg registration form), make arrangements for the implementation of encrypted HTTPS connections and ensure that all personal data is submitted via secure HTTPS connections.

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).

*If registration for the meeting/event takes place via a Commission website:* The registration for the [meeting/event] takes place via a Commission website. 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>.

When you visit the website(s) of our [meeting/event] and when you register, we will keep the browser history of your visit for a maximum of *[the controller should indicate the retention period]*. 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 on EUROPA. More information is available in the Record of Processing DPR-EC-00685 (Europa Analytics).

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 meeting/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.

*[If the data controller employs cookies, which serve to ensure and improve the website experience, but are not listed among the Commission’s cookies [please check: https://ec.europa.eu/info/cookies\_en], then the data controller should identify and explain those cookies here.]*

**Third party IT tools, including Social Media** *[only add* *if applicable]*

We use third party IT tools to inform about and promote the *[meeting/event]* through widely used communication channels, including the 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).

You can watch our videos, which we also upload to our *[the controller should indicate the relevant social media]* page and follow links from our website to *[the controller should indicate other relevant social media]*.

In order 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.

We recommend that users read the relevant privacy policies of *[the controller should insert links to relevant privacy pages of the third party IT tools]* 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.

**International transfers**

*The data controller should involve their DPC in this section of the privacy statement – each case is different!*

*[If the data controller intends to* ***transfer personal data*** *to recipients in a third country or international organisation, it should indicate:*

The controller will transfer your personal data to the following recipients in a third country or to an international organisation in accordance with Regulation (EU) 2018/1725: *[the data controller should indicate all categories of recipients, except for EC staff.]*

The controller will transfer your personal data based on: *[the data controller should specify the legal ground for the transfer by selecting the relevant paragraph below as applicable*]

* *adequacy decision of the Commission for a specific country / commercial sector (Article 47 of Regulation (EU) 2018/1725) [or* *in the absence of this],*
* *[the data controller should explain if there is no adequacy decision for the respective third countries / commercial sectors and indicate] appropriate safeguards (Article 48 of Regulation (EU) 2018/1725) [provide (1) reference to the appropriate safeguards and (2) the means by which a data subject can obtain a copy of them / or indicate where they have been made available]; [or* *in the absence of this],*
* *[the data controller should explain if there is no adequacy decision for the respective third countries / commercial sectors, explain why there are no appropriate safeguards for transfer and indicate derogation(s) for the specific situation(s)].*

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.

*[If applicable, a specific clause about* ***investigations, including legal requests from public authorities****, should be included.]*

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.

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.

*[The data controller should ensure that the data subjects can exercise their right to object to processing whenever possible by the organisers of the meeting/event (for example, on the spot by indicating a non-web streamed seat if requested; or ex-post, by deleting a specific sequence from the online video/voice recording).*

*[****If*** *the data controller has indicated under Heading 3 that a part of the processing is lawful, because it is based on* ***CONSENT*** *of the data subjects (Article 5(1)(d)), then include:*

You have consented to provide 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 *[the data controller should indicate how and where]*. 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: Directorate-General for International Partnerships, *Name of Directorate/ unit responsible (entity)* *and (ONLY) functional mailbox].*

* **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>.

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*[In addition to the relevant privacy statement, the controller can add certain information to websites depending on the meeting/event and the data subjects concerned (e.g. on Intranet for Commission staff):*

*Photographs [and/or audio-visual recordings] of Commission staff will be taken during the meeting/event on behalf of [Directorate-General for… / Service for…/ Cabinet of…]*, *of the European Commission by an authorised staff member [or external service provider]. If you do not wish your photo to be taken during the event, please notify [please indicate the contact person, e.g. webmaster], so that we can make the necessary and appropriate arrangements during the meeting/event]. [The controller should make this clear also to the photo-/videographer before they start taking photos/videos].*

*Photographs may be published afterwards on the [Directorate-General for… / Service for…/ Cabinet of…]’s Intranet. If your image appears in these photographs or in their background and you wish the photographs to be removed from the Intranet, you can contact the Communication Unit [the controller should indicate the contact person, e.g. webmaster] by specifying your request.*

The data controller is processing your personal data under [Regulation (EU) 2018/1725](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32018R1725) *for the purposes of this [meeting or event]. If* you decide to take photographs/audio-visual recordings of participants of the [meeting or event] and/or publish them online, you assume full responsibility for these actions. The same applies if you download the photographs that will be posted on the Intranet and publish them on the Internet. The data controller shall not be held accountable for any processing of personal data that you might carry out on your own initiative during or after the event.].