PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Knowledge for Policy (K4P): E-newsletters and communities

Data Controller: European Commission, Joint Research Centre, Unit H.2

Record reference: DPR-EC-09147

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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 “Knowledge for Policy (K4P): E-newsletters and communities” undertaken by JRC.H.2 is presented below.

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

**Purpose of the processing operation:** JRC.H.2 collects and uses your personal information to provide a public website and e-services for Knowledge for Policy community (K4P) (such as e-newsletters, private messaging, follow and receive notifications about certain topics, commenting, discussion, etc).

An e-service on EC websites is a service or resource made available on the internet in order to improve the communication between citizens, organisations and businesses and the European Commission (EC).

Knowledge4Policy, like all sites published within the ec.europa.eu domain, is governed by the European Commission’s Privacy Policy, which describes 3 types of e-services that are information services, interactive communication services, and transaction services.

Most content on knowledge4policy is publicly accessible without giving any personal information.

The following sections provide some detail on the e-services currently available or under development:

**Members’ Personal Profile:**

K4P members have to publish a Personal Profile on the public website as a precondition for submitting other content for publication. This profile includes personal and professional data, and is linked to their other activity, achievements and contributions to the K4P community.

To provide this service, the member has to submit some of the data indicated in section 4 of this Privacy statement: full name is required, with other data optionally including current or past job positions, brief description, social networks, your picture, your interests and membership, etc. The relevant JRC community moderator may accept the profile and publish it on the K4P website. No other information at any moment is transferred to other systems, exported from Knowledge4Policy or otherwise further treated. No history is saved.

**eNewsletters:**
The Knowledge for policy (K4P) Newsroom is an on-line service offering a set of features to subscribe and unsubscribe to e-newsletters hosted on Knowledge for policy (K4P).

To provide this service, JRC H.2 collects your list of currently chosen newsletters with the associated email address. No other information at any moment is transferred to other systems, exported from the Knowledge for policy (K4P) Newsroom or otherwise further treated. No history is saved. Each change of you subscription erases instantly previous data; this includes also cancelling subscription(s).

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, because, according to Article 5(1) (a) of Regulation (EU) 2018/1725, the 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 and, according to Article 5(1)(d) of Regulation (EU) 2018/1725, you have given consent to the processing of your personal data for one or more specific purpose.

**Legal basis:**

These processing operations are also necessary for the implementation of:

- the successive Framework Programmes of the European Community for "research, technological development and demonstration activities, contributing to the creation of the European Research Area and to innovation",
- all the other research Programmes managed by the JRC (e.g. Euratom-related activities).

**Treaty of the European Union:**

- Article 11: 'The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action'; 'The European Commission shall carry out broad consultations with the parties concerned in order to ensure that the Union's actions are coherent and transparent';

**Treaty on the Functioning of the European Union:**

- Article 298(1): 'In carrying out their missions, the institutions, bodies, offices and agencies of the Union shall have the support of an open, efficient and independent European administration.'

Registration and participation of data subjects are provided on a purely voluntary basis. The persons concerned have unambiguously given their consents (Art. 5 (d) of Regulation (EU) 2018/1725).

We do not process special categories of personal data, therefore Article 10 of Regulation (EU) 2018/1725 does not apply.

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

In order to carry out this processing operation JRC.H.2 collects the following categories of personal data:
Generally, we collect the following categories of personal information:

- **personal data provided by creating an EU Login account**
- **personal data provided for the subscription to e-services (e.g. enewsletter)**
- **personal data provided by registration to other e-services**

The following data fields may be collected either through European Commission Authentication Service (EU Login) or a dedicated on-line registration form, email communication and may be published on K4P:

- **Contact Information from EU Login:** first name, last name, email address, (phone number), Commission personnel number, a unique key and group membership, username and password could also be set up at the first registration.

- **Additionally provided personal data:** title, alias, personal and/or professional postal address, phone number, fax, email address, personal website, link to social network profiles: twitter, LinkedIn, Facebook, Mastodon, other.

- **Demographic information:** Date and place of birth, city, nationality, country, preferred language, default language, gender.

- **Education, professional information:** Education, name of employer/organisation, place of work, position and/or job title/function within an organization, previous affiliation, short biography, curriculum vitae (CV), description of current or previous work, publications.

- **User Content:** Fields of interest, content of communications, comments, blog posts, feedback, and other information provided when contacting K4P or that are shared and posted via our e-services (including information in alerts, notes, and shares of content), information distribution format desired (e-mail or not), documents, scientific publications, and contributions to discussion fora.

- **Your picture:** Photos, avatar, video, voice.

- **Usage and device information:** Internet Protocol (IP) address, K4P login and browsing history, e.g.
  - Date and time of,
  - Most recent successful and unsuccessful authentication
  - Last change of password
  - Last password reset
  - Number of good logins and failed attempts.
  - Account status (whether active, inactive or logged by administrator..)
  - Recent passwords – to make sure you follow the prevailing security policy regarding password re-use.
  - Security data/log files

By accepting the K4P privacy policy when you first log in, you are indicating your consent to the use of the data as described in this statement.

Cookies are managed according to the Commission corporate policy.

The provision of personal data is not mandatory

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

JRC.H.2 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- **Personal data published on the K4P website and K4P and other e-services:**
  Personal data is kept
  - for as long as is necessary to meet the purposes for which they were collected.
• Personal data related to e-newsletter: Personal data is kept
  o for as long as is necessary to meet the purposes for which they were collected.
  o for the time necessary to fulfil the purpose of collection or further processing,
    namely as long as the Knowledge4Policy e-services continues to work in support
    of evidence-informed policymaking.
  o as long as data subjects are actively using e-services.

Personal information will be deleted if it is no longer needed or upon email request
to the Operational Data Controller. In any case, personal data will be deleted and
content created by the user will be anonymized after two years of continuous
inactivity.

• Security data/Log files, IP addresses, Additional data related to a user's
  interaction with a JRC e-service: Date and time of authentication, change/reset of
  password or account status: are stored for a maximum of 2 years. In context of
  investigations of security incidents the data could be further processed following
  record DPR-EC-02886 "DIGIT IT Security operations and services", where a different
  retention period applies.

Registered users to the K4P e-services have password protected access to their profile and can,
at any moment, update their information, cancel their registration or request to unsubscribe
from specific interest groups or communications.

Time limits of the retention of data in the EU Login Authentication Service are defined in the
privacy statement of the European Commission’s Identity & Access Management Service (DPR-
EC-03187).

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 the servers of the European Commission. 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.

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.
In particular:

**For personal data published on K4P websites:** The information published on the JRC websites can be accessed by any person in the world using the Internet or subscribing to Internet notification services.

**For the K4P e-services:** The e-service system administrators have access to all data categories. This includes Commission staff responsible for carrying out this processing operation and authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements. The following data categories may be accessible from other internal and external registered users: **Contact Information**: Title, first name and last name, alias, personal and/or professional (postal address, phone number, email address, personal website). **Demographic information**: Date and place of birth, city, nationality, country, preferred language, default language, gender. **Education, professional information**: Education, name of employer/organisation, place of work, position and/or job title/function within an organisation, previous affiliation, short biography, curriculum vitae (CV), description of current work, scientific publications. **User Content**: Fields of interest, content of communications, comments, feedback, and other information you send to us when you contact us or that you post via our e-services (including information in alerts, notes, and shares of content), information distribution format desired (e-mail or not), documents, scientific publications, and contributions to discussion fora. **Your picture**: Photos, video, voice.

**For the list of email addresses of newsletters’ subscribers:** The Knowledge4Policy Newsroom administrators and the newsletters publishers (knowledge centres, competence centres and other JRC knowledge services) have access to the list of subscribers to their specific newsletters. This includes Commission staff responsible for carrying out this processing operation and authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

In case of a security incident, all data categories may be shared with the JRC LISO (JRC Local Information Security Officer) DIGIT.S (DIGIT IT Security) and HR.DS (HR Directorate Security JRC LISO, DIGIT.S and HR.DS).

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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have consented to provide your personal data to JRC.H.2 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:

  EC-KNOWLEDGE4POLICY@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 Commission, which have been documented and notified to him. You may access the register via the following link: [http://ec.europa.eu/dpo-register](http://ec.europa.eu/dpo-register).

  This specific processing operation has been included in the DPO’s public register with the following Record: DPR-EC-09147 - Knowledge for Policy (K4P): E-newsletters and communities.