



EUROPEAN COMMISSION

## **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:** JRC S.2 Science for Democracy and Evidence-Informed Policymaking

**Record reference:** DPR-EC-09147.3

### **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 Knowledge for Policy (K4P): E-newsletters and communities undertaken by the European Commission Joint Research Centre, JRC.H.2 - Knowledge Management Methodologies, Communities and Dissemination is presented below.

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

The [European Commission's Privacy Policy](#) governs Knowledge for Policy (K4P), as it does for all sites published within the "ec.europa.eu" domain.

Most content of the Knowledge for Policy platform (K4P) is publicly and anonymously accessible, without any voluntary provision of personal data.

For anonymous access, K4P indirectly collects information according to [DPR-EC-00083.2 Processing of personal data on European Commission web sites \(within the europa.eu domain\), including IP addresses, by visitors of the publicly available websites.](#)

Otherwise, JRC.S.2 collects and uses your personal information according to the services you use, namely:

- Interaction with members of the community
- Content submission and review
- Newsletter services

Anyway, your personal data will *not* be used for an automated decision-making or profiling.

### **Purpose: interaction with members of the community**

K4P members have to create and post a *Personal Profile* as a precondition for engaging in community activities; we believe this is important for the long-term value and health of this online community. Therefore, participation in a community calls for the release of personal and professional information, as indicated in section 4 of this Privacy statement.

Before posting your profile, you have to authenticate yourself. K4P implements authentication via EULogin (a service that delivers user authentication to a wide range of Commission information systems) and, as such, processes personal information according to [DPR-EC-03187.1 Identity & Access Management Service \(IAMS\)](#). This means that your unique user ID, First and Family names, and e.mail address are acquired automatically as part of the authentication process.

Once you submitted your profile, an online community moderator reviews it and publishes it on the K4P website. From that point the profile becomes publicly available and you can engage in community activities.

### **Purpose: Content submission and review**

Even if have not created a personal profile, you might be allowed to submit content for publication in K4P. This service requires user authentication to allow identifications of the parties involved (the contributor, who submits content, and the online community moderator, who reviews it). Authentication is provided by EULogin.

### **Purpose: Delivery of Newsletter services**

K4P Newsroom is an online service offering a set of features to subscribe and unsubscribe to e-newsletters hosted on K4P.

To provide this service, JRC S.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).

### **3. On what legal ground(s) do we process your personal data**

We process your personal data, 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;
- the data subject (you) has given consent to the processing of his or her personal data for one or more specific purposes;

Legal basis for such processing:

- 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).

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

In order to carry out this processing operation JRC.S.2 collects the following categories of personal data: data related to identification (mainly acquired as part of the authentication process), data related to professional experience and interests (for community participation), and personal data .

More in detail, the following data fields may be collected through either European Commission Authentication Service (EU Login) or a dedicated on-line registration form or personal profile form, or email communication:

- **Contact Information from EU Login:** user identifier, first name, last name, email address, (phone number), Commission personnel number, a unique key and group membership; password is set up at the first registration to EULogin and not maintained by K4P.
- **At a glance:** a self description in 20 meaningful words is mandatory as deemed necessary for the good functioning of the overall community.
- **Additionally provided personal data (optional):** 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 (optional):** Date and place of birth, city, nationality, country, preferred language, default language, gender.
- **Education, professional information (optional):** 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 (optional):** 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 (optional):** 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

The provision of some personal data is mandatory to meet functional or non-functional requirements related to content submission or participation in community activities. If you do not authenticate via EULogin, you will not be able to submit content for publication. If you do not provide the mandatory profile field, possible consequences are that your profile will not be published on K4P, and you will not be able to engage with the K4P community.

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

JRC.S.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;
- 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;
- as long as data subjects are in 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.

##### **Personal data related to e-newsletter**

Personal data is kept:

- for as long as is necessary to meet the purposes for which they were collected;
- 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;
- 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.

**Security data/Log files, IP addresses** (or 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)

Data is 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 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.

**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)

## **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) on grounds relating to your particular situation.

You have consented to provide your personal data to JRC.S.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.

### **1. 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](mailto: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](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.

**2. 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-09147.3 Knowledge for Policy \(K4P\): E-newsletters and communities](#).