

## **PROTECTION OF YOUR PERSONAL DATA**

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

### **1. Introduction**

The European Agency for the operational management of large-scale IT systems in the area of freedom, security and justice (hereafter, 'eu-LISA') is committed to protect your personal data and to respect your privacy. eu-LISA 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

The information in relation to processing operation "e-CODEX Stakeholders Survey", is presented below.

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

*The Business and Stakeholder Relations Unit (BSU)* collects and uses your personal information in the context of the e-CODEX Stakeholders Survey, to collect information regarding the implementation status of the e-CODEX system from members of the management bodies and all relevant correspondents.

Data is collected using the online survey platform 'EUSurvey' <https://ec.europa.eu/eusurvey>. EUSurvey is a web application for online survey creation and publication developed and maintained by DG DIGIT, the Directorate-General for Informatics of the European Commission known as "DIGIT".

EUSurvey uses Europa Analytics for traffic statistics and analytics. Europa Analytics is the corporate service that monitors and evaluates the effectiveness and efficiency of the European Commission's websites on Europa.eu. Europa Analytics is based on the opensource analytics platform "Matomo" and is installed on a webserver. Both the infrastructure and software are PUBLIC under the full control of the European Commission and comply with the current EU data protection legislation. For more information about the data processing and measures, the 'do not track' preference and other information please refer to EuropaAnalytics website. Data from EUSurvey is stored for 8 weeks after receiving respondents' participation in a secured and protected database hosted by the Data Centre of the European Commission and is manually deleted from EuSurvey by the survey owner. After completing the exercise, data from EUSurvey is transferred to a folder with limited access to BRMS eu-LISA's data centre and manually deleted after 1 year. First-party cookies used by Europa Analytics when using the domain europa.eu (used by European institutions' websites) will expire and be automatically removed from the user's device after 13 months.

Your personal data will not be used for an automated decision-making including profiling.

Your personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, or the European Court of Auditors.

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

We process your personal data, to improve the management and functioning of the e-CODEX System, in the interest of the e-CODEX System, and because by responding to the survey you have given consent to the processing of your personal data for one or more specific purposes.

The lawfulness of the processing operation is based on:

- Article 5(d) of Regulation (EU) 2018/1725, when you as the data subject have given consent to the processing of your personal data for one or more specific purposes. We process your personal data, because:

The selected audience among the members of the management body and relevant correspondents will receive a version of the e-CODEX Stakeholders Survey.

The respondents who take the survey voluntarily, submit their replies and feedback directly via the survey tool.

It is entirely voluntary and optional to respond to the e-CODEX Stakeholders Survey. Every recipient is free to either use or not the link to reply to the survey, without the need to access to any system providing his/her credentials. eu-LISA will be able to see or recognise the identity of the recipient, as the survey requests to indicate their identity via open comments.

Only members of the Business Relations Management Sector process the submissions of the respondents.

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

In order to carry out this processing operation, the Business Relations Management Sector (BRMS) collects the following categories of personal data:

- Name
- e-Communication and/or connection data (e.g. phone network, internet traffic, IP address, logs, user ID, user credentials, number of the caller and the time of the call)
- Free text by which you give comments behind your submission that might reveal some information about your identity, if you choose to include any specific data.

The provision of personal data is not mandatory, but it will permit BRMS to improve the management and functioning of the e-CODEX System, in the interest of the e-CODEX System

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

The Business Relations Management Sector (BRMS) only keeps your personal data for the time necessary to fulfil the purpose of the collection or further processing. Within one month of the termination of the exercise, the owner of the survey (BRMS) will delete all forms of the submissions and results of the survey from the survey tool. After completing the exercise, data from the survey tool is transferred to a folder with limited access to BRMS and manually deleted from the survey tool by the survey owner. Any file with downloaded data will be deleted after 1 year.

For the survey respondents: Data from survey is stored for up to 12 weeks after receiving respondents' participation in a secured and protected database hosted by the Data Centre of the European Commission. First-party cookies used by Europa Analytics when using the domain europa.eu (used by European institutions' websites) will expire and be automatically removed from the user's device after 13 months.

For the survey owner: As long as the user is an EU staff member, the user account remains active and personal data is therefore retained. However, users can, at any time, ask the EUSurvey team to terminate the account if they no longer wish to use the service. In this case, the user account, all associated data and all surveys and results will be permanently deleted.

When determining the maximum retention periods, the Agency takes also into account possible legal recourses, legal, auditing, archiving and reporting obligations.

#### **6. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to eu-LISA staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The survey responses are visible only to its owners (staff member and contractor) and the results will be shared in the AGs and/or to members of the management bodies and concerned correspondents.

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.

#### **7. 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.

Pursuant Article 31 of the Regulation (EU) 2018/1725 the information given above is intended to appear in the records of processing activities of eu-LISA. The data controller/processor is responsible for the content of this record.

Records of processing activities are intended for public information to ensure that data subjects may ascertain the existence of filing systems containing personal data, in order to enable them to exercise their rights in accordance with that Regulation. Any person may consult the register directly or indirectly through the European Data Protection Supervisor.

The data controller/processor is required to provide all the information requested by the Data Protection Officer and has a right of access to and rectification of these data. Any failure to comply with obligations pursuant to the Regulation, whether intentionally or through negligence makes an official or other servant liable to disciplinary action.

The data controller/processor declares the accuracy of the above statements and undertakes to notify any change affecting this information to the Data Protection Officer of eu-LISA.

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.

## **8. 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, (via functional mailbox [e-codex@eulisa.europa.eu](mailto:e-codex@eulisa.europa.eu) ),

Directorate-General for Informatics (DIGIT) of the European Commission, as manager of the application EUSurvey, [DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu), [DIGITD1@ec.europa.eu](mailto:DIGITD1@ec.europa.eu).

### **- The Data Protection Officer of eu-LISA**

You may contact the Data Protection Officer ([dpo@eulisa.europa.eu](mailto:dpo@eulisa.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.