



RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on Article 31 of the Regulation (EU) 2018/1725¹ on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data, each responsible EISMEA data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2019-27-2

Initial approval by Data Controller: [Ares\(2021\)1777217-11/03/2021](#)

Previous Notification (if applicable): n/a

Update (s) (if applicable): n/a

NAME OF THE PROCESSING ACTIVITY

External events organised by the Agency

IDENTIFICATION OF THE DATA CONTROLLER

European Innovation Council and SMEs Executive Agency (EISMEA),
Heads of Unit in charge of the organisation of the relevant event.

GROUND FOR THIS RECORD (select relevant ground)

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place (ex-post)
- Change/Amendment/ Update of an already existing previous record (or previous notification to DPO)

DESCRIPTION OF THE PROCESSING ACTIVITY

The Agency organises regularly events with external participants such as: national contact points, external experts or stakeholders, potential grant applicants and grant beneficiaries of the EU funding programmes under its responsibility.

These events may include kick-off meetings, info days, meetings with beneficiaries, as well as promotional and networking events in countries covered by the programmes under the responsibility of the Agency.

The present record covers the organisation, management and follow-up of these meetings, including invitations of participants, presentations, pictures, videos, web streaming, audio/video recording, reporting, follow-up meetings and actions, lists and mailing lists for invitations, news and publications including intranet and internet.

¹ [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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295/39 of 21.11.2018).

1. INFORMATION ON THE PROCESSING ACTIVITY

of External events organized by the Agency

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**² on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

The Head of Unit at the European Innovation Council and SMEs Executive Agency (EISMEA)³, Place Charles Rogier 16, B-1049 Brussels responsible for the organisation of the event as mentioned in the related Data protection notice (DPN) and can be contacted at the functional mailbox provided in the DPN.

In exceptional cases joint controllers may be responsible for the processing of personal data for an event, if mentioned in the DPN.

1.2. The service providers acting as Processor(s) on behalf of the Data Controller are mentioned in the related DPN, if applicable.

1.3. The legal basis for the processing based on Article 5(1) of Regulation (EU) 2018/1725:

- (a) 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 body⁴;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions or bodies (Recital (22) of Regulation 2018/1725) ;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- (c) the 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;
- (d) the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes for non-mandatory personal data (eg recording, pictures);
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

1.4. The purpose(s) of the processing is the organisation, management and follow-up activities of events organised with external participants and are further specified in the related DPN and usually covers the following:

- invitation of speakers and participants; preparation, use and management of mailing lists;
- registration of participants to events (physical, online, hybrid), management of participation; preparation and management of participants / attendance lists;
- organisation of conferences, workshops, discussion fora, trainings, networking activities or similar ;

² [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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L 295/39 of 21.11.2018).

³ *EISMEA Establishment Act*: Commission Implementing Decision (EU) [2021/173](#) of 12 February 2021 establishing the European Innovation Council and SMEs Executive Agency (EISMEA) (OJ L 50/9 of 15.2.2021).

⁴ *EISMEA Act of Delegation*: [Commission Decision C\(2021\)949](#) delegating powers to the European Innovation Council and SMEs Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of Innovative Europe, Single Market and Interregional Innovation Investments comprising, in particular, implementation of appropriations entered in the general budget of the Union.

Horizon Europe - the Framework Programme for Research and Innovation (2021-2027), Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013 (*OJ L 170, 12.5.2021, p. 1–68*).

Single Market Programme - [Regulation \(EU\) 2021/690](#) of the European Parliament and of the Council of 28 April 2021 establishing a programme for the internal market, competitiveness of enterprises, including small and medium-sized enterprises, the area of plants, animals, food and feed, and European statistics (Single Market Programme) and repealing Regulations (EU) No 99/2013, (EU) No 1287/2013, (EU) No 254/2014 and (EU) No 652/2014 (*OJ L 153, 3.5.2021, p. 1–47*).

Interregional Innovation Investment Initiative 13 - [Regulation \(EU\) 2021/1058](#) of the European Parliament and of the Council of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund (*OJ L 231, 30.6.2021, p. 60–93*).

- taking picture and/or videos, recording of event, speakers, presentation;
- management of follow-up activities such as follow-up meetings, collection of feedback/satisfaction, surveys, distribution of contact/participants/attendance lists, publications related to the event such as news articles, reports, studies, other information material and informing on future events and activities;
- subscription to newsletters, mailing lists, data bases of stakeholder, communities or similar;
- collection of events' statistics.

1.5. The categories of data subjects concerned by this processing are further specified in the related DPN and usually cover:

- internal participants: staff of Agency/ies, Commission services, contractors;
- external speakers, experts, stakeholders;
- grant beneficiaries or applicants;
- national contact points;
- the public: such as potential grant applicants or any individual participating to an event.

1.6. The following personal data are further specified in the related DPN and usually collected:

- identification data such as title, first name, last name, gender, organisation, function;
- contact data such as professional/personal e-mail, phone, postal address;
- date of birth, nationality, passport or ID number (only to allow access to Commission /Agency buildings)
- for online or video conferences the following data may be collected: IP address, geolocation, and browser-generated information, cookies or other technologies used to analyse users' activity.
- for external speakers or experts: biographies and CVs may be collected.

The above mentioned personal data are requested if **mandatory** for the purpose(s) outline above.

In addition, **non-mandatory** personal data may be collected such as Twitter and LinkedIn accounts, pictures, videos and will only be processed based on explicit prior consent.

External events can be **web streamed** or organised by video conference and some participants (e.g. moderators, experts, speakers and persons attending the event) may be recorded/filmed/photographed. The recording may be used for online and offline communication activities related to the event subject to the explicit consent to have image/voice recorded, used for the creation of offline communication material or published online on communication channels, such as social media accounts, image hosting sites and websites linked to the promotion of the event.

1.7. The recipients to whom the personal data will or might be disclosed are further specified in the related DPN and usually cover:

- authorised staff of the Agency and Commission services in charge of the organisation of the event and the follow-up activities;
- participants in the event (limited to contact details);
- the general public for photos and videos posted on website or social media;
- security agents, for example if the event takes place in Agency or Commission premises, limited only to the data necessary for security clearance to access the premises;
- authorised staff of contractors and subcontractor in charge of the organisation of the event and follow-up activities, photos, videos, recording, catering etc.;
- on a need to know basis and in compliance with the relevant current legislation, bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, Court of Auditors, European Anti-fraud Office – OLAF).

1.8. Personal data will not be transferred to third countries or international organisations, unless indicated otherwise in the related DPN.

1.9. The processing of this personal data will not include automated decision-making (such as profiling) unless indicated otherwise in the related DPN.

1.10. The following technical and organisational security measures are in place to safeguard the processing of this personal data: personal data in electronic format (eg e-mails, electronic documents, databases) are stored on the servers of the Agency or the Commission. The Agency or Commission contractors (processors) are bound by a specific contractual clause for the processing operations of personal data on behalf of the Agency. Organisational measures include restriction of access to the personal data to authorised persons with a legitimate need to know for the purposes of this processing activity. If the event entails external processing e.g. via an app or social media, this is detailed in the related DPN.

1.11. The personal data concerned **will be kept for a maximum period** after the event as set out in the related data protection notice. Data will normally be deleted at the end of the following periods eg:

- registration data: deleted after the closure follow-up activities, unless the participant gave the consent for further use;
- photos and videos: published for 2 years after the event has taken place;
- Information collected to access Agency or Commission premises: deleted 6 months after the event.

1.12. Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights** :

- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **Agency's Data Protection Officer** at EISMEA-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

The data subjects rights to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the **Agency's [Restriction Decision](#)** in accordance with Article 25 of Regulation (EU) 2018/1725.

Request from a data subject to exercise a right will be dealt within **one month**.

Any queries concerning the processing of personal data, have to be addressed to the Data Controller responsible for the organisation of the event as mentioned in the related Data protection notice (DPN) and can be contacted at the functional mailbox provided in the DPN.
