



EUROPEAN INNOVATION COUNCIL AND SMEs  
EXECUTIVE AGENCY (EISMEA)

## RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on **Article 31 of the Regulation (EU) 2018/1725<sup>1</sup>** 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-2019-26-02**

**Initial approval by Data Controller:** *see date of Ares stamp*

**Previous Notification (if applicable):** DPO-2010-04

**Update (s) (if applicable):** *October 2023*

### NAME OF THE PROCESSING ACTIVITY

**Managing visitors access to Agency premises.**

### IDENTIFICATION OF THE DATA CONTROLLER

European Innovation Council and SMEs Executive Agency (EISMEA), Director (who delegates to competent Heads of Department/ Heads of Unit/Team leaders).

### 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

The Agency is located in premises of the European Commission (EC). Security and protection of persons present in EC premises subject to the European Commission's security Decision [2017/46](#) of 10 January 2017 is ensured, inter alia, via a systematic access control. This includes the use of appropriate technical equipment and information systems, which may include recording entry to and exit from the premises, identity controls on the premises to prevent unauthorised persons from entering EC premises and to protect the security of the premises.

Accordingly, the external visitors to the Agency premises have to be registered in the V-Pass application of the European Commission where basic personal data is recorded. The registration of visitors can take place directly on site or before the visit, based on information collected directly from visitors or from appropriate sources (eg internal data bases, coordinators, contractors) by authorised Agency staff and encoded in the V-Pass application. Access of external visitors to Agency premises is subject to systematic identity and access control.

<sup>1</sup> [Regulation \(EU\) 2018/172](#) 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 managing visitors access to Agency premises

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725<sup>2</sup>** 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:

European Innovation Council and SMEs Executive Agency (EISMEA), B-1049 Brussels, Belgium, the Director who delegates to the competent Heads of Department/ Heads of Unit/ Team leaders responsible for the underlying procedure requiring access of visitors to the Agency premises and who can be contacted at the email address provided in the applicable Data protection notice.

### 1.2. The following entity(ies) is/are acting as Processor(s):

The European Commission's Directorate General for Informatics (DIGIT), Directorate General Human Resources Security Directorat, Office for Infrastructure and Logistics for Brussels and their contractors; EC security guards.

### 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 body laid down in Union law;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions, bodies or agencies (Recital (22) of Regulation (EU) 2018/1725) laid down in Union law;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject, which are laid down in Union law, in particular Commission Decision (EU) N° [2017/46](#) of 10 January 2017 on Security in the Commission;
- (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;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

### 1.4. The purposes of this processing are to control access of visitors to ensure:

- Authorisation of access to site (registration of visitors).- Security measures to protect the persons and the Agency's premises. - Physical protection of the site (guards, alarms, video surveillance, etc.). - Protection of organisational assets, information and monitoring of information system security.

### 1.5. The categories of data subjects concerned by this processing are:

External visitors of the Agency's premises (EC building).

### 1.6. The following personal data are collected:

First name, last name, e-mail address, date of birth, nationality, passport/ID number, document expiry date; biometric data, if applicable.

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

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<sup>2</sup> [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).

If the above mentioned mandatory identification data data are **not obtained directly** from the data subject, it is obtained eg from internal data bases of the Commission, coordinators, contractors) and collected by authorised Agency staff and encoded in the V-Pass application of the Commission, as specified in the applicable data protection notice. In addition **non-mandatory** personal data and other information may be collected such as the type of visit, arrival/departure time, specific requirements, organisation/company, plate number etc.

**1.7. The recipients** to whom of the personal data will or might be disclosed are: competent Agency/Commission staff; security agents of the Commission; authorised staff of contractors; a limited set of data may be shared with other stakeholder as specified in the applicable data protection notice as well as bodies in charge of monitoring or inspection tasks in application of Union or national law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF), European Public Prosecutor's Office (EPPO), law enforcement bodies).

**1.8. Personal data will not be transferred to third countries or international organisations.**

**1.9.** The processing of this personal data **will not include** automated decision-making (such as profiling).

**1.10. The following technical and organisational security measures** are in place to safeguard the processing of personal data:

The Agency is subject to the European Commission's security Decision [2017/46](#) of 10 January 2017. All personal data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored on the servers located in the EU/EEA of EISMEA, the European Commission or of its contractors. In addition contractors are subject to specific contractual provisions on security and confidentiality.

**1.11.** The personal data concerned **will be kept for a maximum period** of 6 months from the submission of the data. Data will be deleted at the end of this period.

**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 **EISMEA Data Protection Officer** at [EISMEA-DPO@ec.europa.eu](mailto:EISMEA-DPO@ec.europa.eu) and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

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

Your right 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 **applicable [Restriction Decision](#)** in accordance with Article 25 of Regulation (EU) 2018/1725.

Any queries concerning the processing of personal data, have to be addressed to the Data Controller indicated above in 1.1. who can be contacted at the email address provided in the applicable Data protection notice.

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