



EUROPEAN COMMISSION
Executive Agency for Small and Medium-sized Enterprises (EASME)

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 EASME data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2020-07

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

Previous Notification (if applicable): *n/a*

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

NAME OF THE PROCESSING ACTIVITY

Managing the obligatory records of meeting participants in the context of COVID-19

IDENTIFICATION OF THE DATA CONTROLLER

Executive Agency for Small and Medium-sized Enterprises (EASME), Head of Unit C.2 Administration, HR team.

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 purpose of this processing operation are to record and identify participants for all meetings organised by EASME. This applies to internal meetings, meetings with external participants, stakeholders' meetings, conferences, etc. on EASME or Commission premises as well as on external venues. The aim is to register participants to meetings centrally, to identify them in case an infection occurs and to take all necessary measures to protect their health.

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 managing the obligatory records of meeting participants in the context of COVID-19

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725²** 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 Administration C.2 at the Executive Agency for Small and Medium-sized Enterprises (EASME), Place Charles Rogier 16, B-1049 Brussels and can be contacted at: EASME-HR-Administration@ec.europa.eu.

1.2. The following entity is acting as Processor:

European Commission – Directorate-General for Human Resources and Security (HR) - HR-DATA-PROTECTION-COORDINATOR@ec.europa.eu and the Directorate-General for Interpretation (SCIC) - scic-data-protection-coordinator@ec.europa.eu.

1.3. The legal basis for the processing based on Article 5(1) of Regulation (EU) N° 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 body³;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions or bodies (Recital (22) of Regulation (EU) N° 2018/1725) ;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject, and in particular Article 1e(2) the Staff Regulations⁴ on working condition and health of the EU staff members;
- (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 purpose(s)** of this processing operation are to record and identify participants for all meetings organised by EASME. This applies to internal meetings, meetings with external participants, stakeholders' meetings, conferences, etc. on EASME or Commission premises as well as on external venues. The aim is to register participants to meetings centrally, to identify them in case an infection occurs and to take all necessary measures to protect their health

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

All participants (internal/external) attending meetings organised by EASME.

1.6. The following personal data are collected:

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 EASME Act of Establishment: Commission Implementing Decision C(2013/771/EU) of 17 December 2013 establishing the 'Executive Agency for Small and Medium-sized Enterprises' and repealing Decisions 2004/20/EC and 2007/372/EC.

⁴ Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community as last amended by Commission Decision 2018/C 451/07 (OJ 45/1385 of 14.6.1962).

Names/first names, e-mail & phone numbers of participants to meetings. These data are **mandatory** for the purpose(s) outline above.

1.7. The recipients to whom of the personal data will or might be disclosed are: the EASME Director, Head of Department C, Head of Unit C2 Administration, Head of Sector HR, relevant authorised staff of EASME HR Sector and of relevant Commission services (i.e. SG, DG HR.DS, SCIC) and bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, European Anti-fraud Office – OLAF).

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 this personal data: only one person and back-up in EASME is accessing all the data simultaneously and will receive access to password protected central repository of Secretariat-General in order to upload the data on a daily basis - all files are to be sent by the relevant unit to eamse-covid19@ec.europa.eu.

1.11. The personal data concerned will be kept for a maximum period of **2 months** from the date of the organisation of the meeting. Data will be manually 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 **EASME Data Protection Officer** at EASME-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

Restrictions in particular for the right to information, modification or cancelation in accordance with Article 25 of Regulation (EU) No 2018/1725 will apply in case of pre/investigations for irregularities or fraud in order not to jeopardize potential investigations.

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 indicated above in 1.1. at eamse-hr-administration@ec.europa.eu.
