



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-2020-08

Previous Notification (if applicable): n/a

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

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

NAME OF THE PROCESSING ACTIVITY

EASME Staff Committee activities

IDENTIFICATION OF THE DATA CONTROLLER

Staff Committee of the Executive Agency for Small and Medium-sized Enterprises (EASME)

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

This processing activity covers the processing of personal data by the EASME Staff Committee.

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 the EASME Staff Committee

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 EASME Staff Committee of the Executive Agency for Small and Medium-sized Enterprises (EASME), Place Charles Rogier 16, B-1049 Brussels and can be contacted at:

EASME-STAFF-COMMITTEE@ec.europa.eu

The Staff Committee is represented by its Chair / Vice-chair or one of its members for data processing.

1.2. The following entity(ies) is/are acting as Processor(s): *Not applicable*

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, which are Article 9 and Annex II of the Staff Regulations⁴.
- (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 is/are to:

Collecting personal data contained in queries sent by EASME staff or staff from other European Institutions to the EASME Staff Committee and either providing them with an answer or using them anonymised to undertake any action falling within the remit of the EASME Staff Committee.

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).

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

- All Staff members of EASME;
- Members of the EASME Staff Committee and alternates;
- Staff members of the European Commission.

1.6. The following personal data are collected:

- Contact data: name, job title/function, Unit and Sector of assignment, contact details (e-mail address and phone number) as well as other contact data, such as links to personal accounts on social media, e.g. Twitter, LinkedIn, etc.;
- Queries, personal views and opinions of the EASME staff on different matters and/or the description of issues and difficulties experienced;
- Sensitive categories of personal data, such as health issues, sexual orientation, religious beliefs, political orientation, trade union membership, may be collected and processed in exceptional circumstances, for example if a staff member reports on particular issues or difficulties experienced.

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

In addition, **non-mandatory** personal data may be collected and can only be processed based on the explicit prior consent of EASME staff / European Commission staff.

1.7. The recipients to whom the personal data will or might be disclosed are active members of the EASME Staff Committee and alternates. The Staff Committee is bound to ensure the confidentiality of the communications received vis-à-vis the Agency and any other party (e.g. Common Staff Committee of the Executive Agencies) and can only reveal personal data with the prior explicit consent of the concerned EASME / European Commission staff to the EASME management or any other concerned party.

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 active EASME Staff Committee members have access to the above-mentioned functional mailbox. The latter is the official communication channel with the EASME Staff Committee through which queries and messages are usually received. All computers of EASME staff are password protected and messages are stored on secured servers. If paper files are received, the Staff Committee store those documents in a locked cupboard.

1.11. The personal data concerned will be kept until the end of the mandate of the current EASME Staff Committee and specifically until the next EASME Staff Committee enters into service⁵. 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);

⁵ The current EASME Staff Committee entered into Service on 1 March 2018 for a three-year term.

- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **to 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>).

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

Any query concerning the processing of personal data, have to be addressed to the Data Controller indicated above in 1.1. at EASME-STAFF-COMMITTEE@ec.europa.eu.
