



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

**Record No:** R-2020-09

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

**Previous Notification:** DPO-2016-02

**Update (s) (if applicable):** 03-2018

### NAME OF THE PROCESSING ACTIVITY

**'Your Europe Business' website - Communication of requests from requestors to selected Enterprise Europe Network partners**

### IDENTIFICATION OF THE DATA CONTROLLER

Executive Agency for Small and Medium-sized Enterprises (EASME), Head of unit A.1. COSME

### 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

Since 2005 the 'Your Europe Business' portal is the public reference portal for enterprises interested in cross-border activities within the European Union, a practical guide to doing business in Europe. The European Commission and EASME provide established businesses and new entrepreneurs with relevant information on their rights and obligations, formalities and procedures to follow when operating within the single market. The information is derived from the European Commission policy units and from national correspondents based in Member State ministries. The portal:

- is a "Front-office" for businesses and entrepreneurs who want to be better informed when starting/managing a business in multiple countries of the European Union;
- provides practical information on EU-wide rights/obligations;
- provides access to information on the implementation of EU rules through national legislation;
- is the hub for the 'single digital gateway' established by Regulation 2018/1724.

On content pages of the 'Your Europe Business' website, via the 'Help and Advice' link, visitors can request — through an 'EEN enquiry form' — to be put directly in contact with the Enterprise Europe Network partner(s) based in a specific town/city and send them their enquiry.

Your Europe's content management system will transfer all information provided via the form, including personal data, such as contact details directly to the Enterprise Europe Network partner chosen by the requestor. An anonymised version of the query will be stored for statistical purposes and user research in the database of Your Europe's content management system .

<sup>1</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).

# 1. INFORMATION ON THE PROCESSING ACTIVITY of Your Europe Business - EEN Enquiry form

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:

Head of Unit A1 COSME at the Executive Agency for Small and Medium-sized Enterprises (EASME), Place Charles Rogier 16, B-1049 Brussels and can be contacted at: EASME-COSME-DP@ec.europa.eu.

## 1.2. The following entities are acting as Processors on our behalf:

NOVACOMM S.A. - 192 Rue Royale, 1000 Brussels, in consortium with ICF NEXT Belgium – Marnixlaan 7, 1000 Bruxelles for web editing and web development.

## 1.3. The legal basis for the processing based on Article 5(1) of Regulation 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<sup>3</sup>;
- (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;
- (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:

The purpose of the process is to establish the contact between the visitors of the 'Your Europe Business' website and the Enterprise Europe Network partners, being grant beneficiaries under the COSME programme.

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

Any person who has an enquiry and wants information about cross-border business activities within the European Union.

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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).

<sup>3</sup> **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 ---- **COSME legal basis:** Regulation (EU) No 1287/2013 of the European Parliament and of the Council of 11 December 2013 establishing a Programme for the Competitiveness of Enterprises and small and medium-sized enterprises (COSME) (2014 - 2020) and repealing Decision No 1639/2006/EC Text with EEA relevance.

**1.6. The following personal data** are collected of requestors and transferred to EEN partners via the form hosted on the “Your Europe Business” website:

- First name
- Surname
- Email
- Phone
- Town/region
- Country
- In addition the “Enquiry” may contain personal data.

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

**1.7. The recipients** to whom the personal data will or might be disclosed are only authorized staff of Enterprise Europe Network partners selected by the requestor and authorized staff of the ‘Your Europe’ team at the European Commission and EASME as well as bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, European Court of Auditors, 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: All servers used by the Agency/Commission abide to the European Commission's security Decision [2017/46](#) of 10 January 2017, replacing the former Commission decision ([C\(2006\)3602](#)) of 16 August 2006 on the security of information systems used by the European Commission.

**1.11. By submitting an enquiry via the corresponding form available on the “Your Europe Business” website, the enquiry form is directly transferred to the Enterprises Europe Network partner selected by the requester and Personal data concerned will not be kept.**

**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 **Data Protection Officer** of the Agency at [EASME-DPO@ec.europa.eu](mailto: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 queries concerning the processing of personal data, have to be addressed to the Data Controller indicated above in 1.1. at [EASME-COSME-DP@ec.europa.eu](mailto:EASME-COSME-DP@ec.europa.eu).

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