

DPO-3050.5 - TRADE : DG Trade – Meetings, workshops, seminars, conferences, events, including mailing-lists and contact lists

General information

Creation : 06/08/2009

Last updated : 20/07/2015

Registration : Not yet registered

Status : Acceptance

Deleted : No

DG.Unit : TRADE.A.3

Controller : 

Delegate : 

DPC : 

Keywords :

Corporate : No

Language : English

Model : (DG XXXX Meetings/ Workshops/ Information day/ Events/Seminars/ including Experts meetings, Lists and Mailing-Lists)

EDPS opinion (prior check) : No

Target Population :

DPC Notes :

Processing

1 . Name of the processing

DG Trade – Meetings, workshops, seminars, conferences, events, including mailing-lists and contact lists

2 . Description

The coordination, organization and management of meetings, workshops, info days, events, seminars, etc... (called "meetings") by the DG.

- to send e-mails, invitation letters; collect names, postal/e-mail addresses, phone/fax numbers, by electronic/manual means; publish participants lists and distribute it to participants and organizers;
- to publish minutes/reports/notices/proceedings/news, photographs/pictures, live webstreaming and/or audio and video recording of speakers and participants, presentations of speakers, including on internet/intranet, in the context of the meetings and in the framework of European Commission activities;
- to collect and manage lists and mailing-lists for meetings, news and publications;

Four different ways to manage the meetings are taken into consideration in this notification and within the model privacy statement:

- Meeting organised by DG staff internally (including or not reimbursement of travel expenses & payment of daily allowances)
- Meeting organised by DG staff by using the SCIC services
- Meeting organised by both DG staff and an external company
- Meeting of DG Expert Groups (formal or informal Groups which are part of the SecGen Registry publicly available on Europa).

The Comitology meetings, under the responsibility of the SG, are covered by the corporate notification DPO-2456

3 . Processors

DG TRADE staff

4 . Automated / Manual operations

Filing system (on paper) in the DG in ad hoc files within Unit(s) organising each "meeting".

Collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, evaluation, use, disclosure by transmission, dissemination or otherwise making available, including on the internet/intranet, alignment or combination, blocking, erasure or destruction.

The list of participants (including first name/surname/passport or ID card n°/date of birth/nationality) is sent via e-Pass to the Security Office of the Commission for access control purposes by security guards to Commission's premises (under the responsibility of DG HR.DS - see Notification DPO-508 and DPO-2638).

Where needed, personal data of experts/observers are published in the Register of Commission Expert Groups and Other Similar Entities (<http://ec.europa.eu/transparency/regexpert/index.cfm>) for as long as the membership upholds and/or until removal from the public site is requested, in view of the transparency policy of the European Institutions and the need to inform the public of the identity and qualifications of the experts advising the Institution. This Register is under the responsibility of SecGen - see Notification DPO-2194).

Where needed, personal data are collected for financial and contractual relations and processed through the IT systems under the responsibility of DG BUDG (see Notification DPO-372 & DPO-300).

Where needed or requested, post-editing of raw recordings of sound and images may be done.

5 . Storage

Paper; Electronic data bases, Excel spreadsheets, photographs/pictures, audio and video supports on electronic databases and repositories stored on internal or external servers.

6 . Comments

In addition, if it is envisaged that images of participants will be recorded or published, the possibility to opt-out needs to be offered. In these cases, and according to available resources, the organizer could offer those participants an alternative room where to follow meeting and debates by means of live webstreaming displayed on a screen. Clear indication and information to hostesses will be provided for to correctly guide participants.

In case of unavailable resources, those participants can locally follow live meeting and debates at the webstreaming Internet address indicated on the subscription form by the organizer.

The publication of internal events images is covered at DG level by the Model-notification "Intranet" (see TRADE notification DPO-3467).

As processing of lists and mailing-lists is almost equivalent than for meetings, it is covered by this notification.

Purpose & legal basis

7 . Purposes

Organisation and management of meetings with or without outside participants, including management of: lists for contacts, invitations, participants, presentations, photographs/pictures, live webstreaming and/or audio and video recording, reporting, distribution of reports, feedback on reports, meeting follow-up or evaluation, follow-up meetings, follow-up actions, lists and mailing-lists for invitation, news and publication, including on intranet/internet.

8 . Legal basis and Lawfulness

The processing operations on personal data linked to the organisation and management of meetings/workshops/events/etc. is necessary for the management and functioning of the Commission, as mandated by the treaties, and more specifically articles 5, 7 and 211 - 219 of the EC Treaty.

The processing operations on personal data for the organisation and management of Meetings/ workshops/ information days/ events/ seminars with or without outside participants are necessary and lawful under article 5 (a) of Regulation (EC) 45/2001.

Articles 20 "Exemptions and restrictions" and 27 "Prior checking (by the EDPS)" are not applicable.

Data subjects and Data Fields

9 . Data subjects

All the persons invited and participating to the "meeting" are subject to this notification.

10 . Data fields / Category

Only data necessary for the organisation and management of the meeting, such as Gender (needed for the right title)/first name/surname/profession/ postal & e-mail addresses/phone number/fax number...

Live webstreaming and/or audio and video recording of speakers and participants, presentations of speakers could be published in the context of the meeting (in this case, an opt-out is provided for in the on-line registration form as explained in the Model privacy statement).

For access control purpose by security guards to the Commission's premises (under responsibility of DG HR. DS -see Notification DPO-508 and DPO-2638): first name/surname/passport or ID card n°/date of birth/nationality.

For purpose of reimbursement of travel expenses/allowances: information about the form of transport use & hotel, and banking information (under the responsibility of DG BUDG - see Notification DPO-372 & DPO-300).

Rights of Data Subject

11 . Mandatory Information

The attached Model Privacy Statements will be adapted as appropriate related to the meeting:

1. Model PS (Meeting) for on-line registration
 2. Model PS (Invitation) to be used for invitations by letter or e-mail of meetings where nothing is published
 3. Model PS (Mailing List) for mailing-lists
 4. Model PS (Contact List) for contact lists
 5. The attached Model Note to be addressed by the Controller to all Heads of Unit describes the objectives and the scope of this notification covering all these activities for the DG.
- It explains how to take a profit of this unique notification by only adapting the provided Model Privacy Statements for any meeting organized by a Unit. It reminds the main principles to comply with Regulation 45/2001 when processing personal data.

List of attachments

- [Meetings_PS1_online_en_updated.doc](#)
- [Meetings_PS2_short invitation_en_updated.doc](#)
- [Meetings_PS3_mailingList_updated.doc](#)
- [Meetings_PS4_contactlist_en_updated.doc](#)
- [DPO-3050.5 meetings model-Note to HoU.doc](#)

12 . Procedure to grant rights

see attachments

13 . Retention

Personal data is kept as long as follow-up actions to the meeting are necessary with the regard to the purpose (s) of the processing of personal data as well as for the meeting and its related management. All personal data will be deleted from databases 1 year after the last action in relation to the meeting. Reports containing personal data will be archived according to the Commission's legal framework.

Nevertheless, where needed, after this delay, personal data will be part of a list of contact details shared internally amongst the European Commission services for the purpose of contacting data subjects in the future in the context of the Commission's activities. If data subjects do not agree with this, they may contact the Controller by using the Contact Information as mentioned in the Privacy statement.

The Privacy statement informing data subjects that they may contact the Controller if they do not wish to be part of the list of contacts anymore, will be published each time when organising "meetings" and collecting personal data.

14 . Time limit

The organizer assesses the arguments of the data subject as soon as the DG staff organising the meeting reads an e-mail message requesting blocking/erasing data for legitimate reasons.

At the latest 5 working days after the reception of the e-mail, the request is answered respectively executed.

15 . Historical purposes

For communication and educational purposes of interpreters, some recordings of webcasts could be used longer by the SCIC services for a limited number of persons.

This processing is described in a specific notification to the DPO.

Recipients

16 . Recipients

Participants of the meetings and a wider public if it is provided that personal data are published on Internet, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Community legislation.

For transparency purpose, personal data of experts/observers which are members of a Commission's Experts Groups and Other Similar Entities are published on Europa in the Register of Commission Expert Groups and Other Similar Entities (<http://ec.europa.eu/transparency/regexpert/index.cfm>) for as long as the membership upholds and/or until removal from the public site is requested. This Register is under the responsibility of SecGen (see Notification DPO-2194).

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17 . Transfer out of UE/EEA

If personal data are published on a publicly available website (e.g. Europa), this means that they are accessible worldwide. Following the opinion of the EDPS, this does not constitute a transfer of personal data under art. 9 of Regulation 45/2001.

Anyhow, in these cases, the participants have to be aware of such a publication and the opportunity has to be given to them to opt-out on legitimate grounds which are assessed by the organizer.

Therefore the specific privacy statement attached to question 11 provides for the possibility of opting out.

If a report including the presence list is shared between participants and organisations represented in the

meeting, in order to keep the network of the participants operational, and as it is a Commission document, it underlies also Regulation (EC) 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

Security measures

18 . Technical and organizational measures

General security Organisational measures in force in the Commission.

19 . Complementary information

The notification in "word" format is annexed to the Controller's note to HoU.