



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about the processing and the protection of your personal data in the context of the Study of interoperability tools in the Digital Single Market.**

**Processing operation:** *Targeted consultation activities, including surveys, interviews and focus groups)*

**Controller:** *European Commission*

**Record reference:** *DPR-EC-01011*

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## **1. Introduction**

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to the processing of personal data linked to targeted consultation activities organised by the services of the Commission is presented below.

## **2. Why and how do we process your personal data?**

Purpose of the processing operation: The Commission collects and uses your personal information within the framework of targeted consultation activities to obtain your views on a specific initiative, policy or intervention.

In this instance, you are being contacted by VVA Market Research Srl, which is a sub-contractor of EY Economic and Policy Advisory Services, in the context of the wider consortium led by WIK-Consult and composed of EY Economic and Policy Advisory Services, and Decision Etudes & Conseil, and that acts as contractor of the Commission (hereafter 'the Contractor') since it has concluded that your views are relevant and necessary for the purposes of the Study of interoperability tools in the Digital Single Market. The contractor that will process your survey responses is WIK-Consult and the consortium that it leads, composed of WIK-Consult, EY Economic and Policy Advisory Services, and Decision Etudes & Conseil. The Contractor and sub-contractor will process data on behalf of the Commission and according to its instructions.

You were contacted because you voluntarily registered for the online panel owned by Cint and managed by VVA Market Research solely for research purposes. Your contact details are securely stored in Cint database, could be accessed by VVA Market Research only with Cint's permission and are not accessible to WIK-Consult, EY Economic and Policy Advisory Services, Decision Etudes & Conseil and the Commission. When you participate in the survey, your responses are submitted to a separate survey platform managed by the Contractor and stored in a different database. To ensure full anonymization, each respondent is identified only by a unique "survey ID" generated specifically for this survey, which ensures that your survey responses cannot be linked back to your personal contact details. The database collecting all the survey responses is anonymized and your identity remains protected throughout the process.

## **3. On what legal ground(s) do we process your personal data**

We process your personal data, because:

- (a) processing is necessary for the performance of a task carried out in the public interest;
- (b) you have given consent to the processing of your personal data for the purpose of the targeted consultation activities in question.

You may exercise your right to withdraw your consent by contacting the Data Controller (see Heading 9 below for contact information).

The Union law which is the basis for the processing based on Article 5(1)(a) of Regulation (EU) 2018/1725 is Article 53 of Regulation (EU) 2022/1925 and the Treaty of the European Union, and more specifically its Articles 1 and 11, Article 298 of the Treaty on the Functioning of the European Union, read in conjunction with Recital 22 of Regulation (EU) 2018/1725), as well as the Protocol 2 on the application of the principles of subsidiarity and proportionality.

#### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation the following categories of personal data may be processed:

- Country of residence
- Personal data related to the physical, economic, cultural, or social identity of the respondent (gender, age, level of education)
- Personal data included in the response or contribution to the targeted consultation activity, including (personal) opinions

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply to the targeted consultation.

Please note that the Data Controller does not request nor expect that data subjects provide any special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data the data subject is considered to provide his/her explicit consent to the processing, in accordance with Article 10(2)(a) of Regulation 2018/1725.

#### **5. How long do we keep your personal data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for a maximum of one year after the closure of the survey. In this instance, the final outcome will be a final report from the Contractor’s project, which is expected by December 2025.

#### **6. How do we protect and safeguard your personal data?**

Your survey responses, which contains personal data listed above (country of resident, socio-demographic characteristics and personal opinions) are submitted to a survey platform managed by the sub-contractor. To ensure full anonymization, each respondent is identified only by a unique 'survey ID' generated specifically for this survey. This guarantees that your survey responses cannot be traced back to your personal contact details, which were previously stored in the Cint database at the time of your registration. The data collected by VVA Market Research, including all survey responses, remains anonymized, ensuring your identity is protected throughout the process.

The survey responses that contain personal data (country of resident, socio-demographic characteristics and personal opinions), which are not linked to your contact details, are stored on

the servers of the Commission and of the Contractor, in this particular instance. All processing operations are carried out pursuant to [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Contractor is bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

#### **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff in Unit F3 of the Directorate-General for Communication Networks, Content and Technology responsible for carrying out this *processing operation* and to authorised staff, including the Contractor's staff, according to the "need to know" principle, in particular to follow-up on the targeted consultation. Such staff abide by statutory, and when required, additional confidentiality agreements. Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The Contractor's staff are bound, by extension of the Contractor's obligations, by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. The Contractor's staff are subject to appropriate technical and organisational measures to ensure the level of security, required by the Commission.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

Your personal data will not appear in any results of the Contractor's work that may be published and/or be shared with market participants.

#### **8. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Under certain conditions, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

Insofar you have consented to the certain processing of your personal data to the Data Controller for the present processing operation, you can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller: [CNECT-F3@ec.europa.eu](mailto:CNECT-F3@ec.europa.eu).

### **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-01011.