



PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data

Processing operation: CONREP (“CONsent and contact REpository”)

Data Controller: European Commission, Directorate-General for Communication

Record reference: DPR-EC-09226

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1. Introduction

The European Commission (hereafter 'the Commission') is committed to protecting your personal data and to respecting 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 reasons 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 operations via the CONREP system undertaken by the Commission are presented below i.e. this privacy statement explains how your personal data is handled when you register as a user of CONREP. It does not cover the data protection aspects linked to the personal data processed within online forms, e.g. for registration to a meeting or event, or in order to subscribe to receive information. All personal data collected within such a form will be processed by and under the responsibility of the relevant E.C. Representation. Please refer to the privacy statement of the specific processing operation for further information.

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

CONREP ("CONsent and contact REpository") is an in-house contact and event management system, specifically built for the creation, distribution and management of mass-mailing invitations, facilitating registration to meetings and events and managing subscriptions to receive information distributed by E.C. Representations in the Member States (e.g. newsletters and other publication materials).

CONREP contact management system facilitates the work of E.C. Representations for their communication and outreach activities with external stakeholders (e.g. establishing and managing lists of persons who subscribe to receive information, storage of personal data, consent management). The system allows E.C. Representations to manage their own contact lists in an independent network environment. This means that while each individual E.C. Representation can enter and manage the personal data of its external users, such access is limited to a specific national network database.

In addition to the personal data processed through CONREP, there is personal data being processed within the online forms, e.g. for registration to a meeting or event, or in order to subscribe to receive information. All personal data collected within such a form will be processed by and under the responsibility of the relevant E.C. Representation.

The E.C. Representations use CONREP for their communication activities and have the legal obligation to create and publish their own privacy statement when collecting personal data. Please refer to the privacy statement of the specific processing operation for further information.

Your personal data will not be used for automated decision-making including profiling.

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

We process your personal data, because:

- 1) 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 (Article 5(1)(a) of the Regulation 2018/1725).

Regarding the Back office of CONREP, it is laid down in the following Union law:

- Article 58(2) of Regulation (EU, Euratom) 2018/1046 (Financial Regulation);
- Section 2.2 of the [Annex of Commission Decision C\(2021\) 8346](#) on the financing of Directorate-General for Communication's operational activities and on the adoption of the work programme for 2022.

The above Section from the DG COMM's work programme lays down the communication activities of the Commission Representations, including promoting Commission initiatives among specific stakeholders. That includes ad hoc communication actions on a national or international scale that fit in with the communication priorities.

The processing of publicly available contacts created via the Back office of CONREP is also based on the above legal basis.

- 2) you have given consent to the processing of your personal data for one or more specific purposes (Article 5(1)(d) of Regulation (EU) 2018/1725).

Consent is needed for creating CONREP user accounts and to process private contacts in the following ways:

- the external users may self-register via the Front office of CONREP, or
- the Commission staff in charge of managing the contact database registers them via the Back office of CONREP.

Private contacts are not published contrary to publicly available contacts.

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

In order to carry out this processing operation the Data Controller may collect the following categories of personal data:

1. User data (internal and external)

- login credentials: username and password
- identification data: first name, last name, email address

2. Registration form's specific data (i.e. personal data collected through an individual online registration form)

Each registration form created can collect personal data, an operation which is placed under the control of the E.C. Representation. All personal data collected within such a form will be processed by and under the responsibility of the relevant E.C. Representation. The E.C. Representations use CONREP for their communication activities and have the legal obligation to create and publish their own privacy statement when collecting personal data. Please refer to the privacy statement of the specific processing operation for further information.

The Data Controller may share aggregate or de-identified information with other Commission Directorates for statistical purposes.

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.

5.1. User data (internal and external)

Internal user: For as long as an internal user has a valid CONREP license, the user account remains active and user's personal data is therefore retained. Periodical review will be conducted every 2 (two) years in order to verify which users are still licensed to use CONREP in each E.C. Representation. Once verified that a user is no longer licensed to use CONREP the corresponding user account and all associated data, will be permanently deleted. This is without prejudice to the licence in use.

External user: For as long as user account remains active. However, at any time, user may ask the CONREP team in the concerned E.C. Representation to terminate the account if the user no longer wishes to use the service. The corresponding account and all associated data, will be permanently deleted.

In addition, if a user account is not in use for 5 (five) years (i.e. no activity) an automatic reminder will be sent in order to verify whether the user still wishes to remain on CONREP. If there will be no reaction to the reminder, then the user account will be automatically removed. This automatic reminder will be sent shortly prior to the completion of inactivity period.

5.2. Registration form specific data (i.e. personal data collected through individual online registration forms)

For the period(s) for which the specific online form is valid (maximum 5 (five) years). The E.C. Representations use CONREP for their communication activities and have the legal obligation to create and publish their own privacy statement when collecting personal data. Please refer to the privacy statement of the specific processing operation for further information.

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

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the Commission or its contractors, all within the EU. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the Commission, and by the confidentiality obligations deriving from the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).

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 personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

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

Access to your personal data is provided to the authorised personnel of the European Commission and external contractors under the contracting authority represented by the European Commission and Commission Representations responsible for carrying out this processing operation according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

CONREP system allows E.C. Representations to manage their own contact database in an independent network environment. This means that while each individual E.C. Representation can enter and manage the personal data of its subscribers, such access is limited to a specific national database.

Only Commission staff members and service providers with administrator access rights can view the entire network of national databases. In addition, the staff members and service providers of the Unit in charge of the software development is also able to modify the parameters of CONREP system (e.g. retention periods, access rights).

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. As regards this processing operation, you can exercise the following rights:

- the right to access your personal data (Article 17 of Regulation (EU) 2018/1725);
- the right to rectification in the case that your personal data is inaccurate or incomplete (Article 18 of Regulation (EU) 2018/1725);
- the right to erasure of your personal data (Article 19 of Regulation (EU) 2018/1725);
- where applicable, the right to restrict the processing of your personal data (Article 20 of Regulation (EU) 2018/1725);
- the right to data portability (Article 22 of Regulation (EU) 2018/1725);
- and the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

If you have provided your consent for the present processing operation, you can withdraw it at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn your 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 Section 9.

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

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, Directorate-General for Communication, Unit COMM.C.1: COMM-C1@ec.europa.eu

The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (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) 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-09226