



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: SoHO Platform

Data Controller: SANTE.D.2

Record reference: DPR-EC-36208

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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 processing operation “SoHO Platform” undertaken by SANTE.D.2 is presented below.

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

Purpose of the processing operation: SANTE.D.2 collects and uses your personal data to establish, operate and manage the EU SoHO Platform in accordance with the Union legal framework on substances of human origin (SoHO).

The processing of personal data is necessary to manage access rights and user authorisations, to register and update information on SoHO entities and related regulatory activities, to support information exchange and administrative cooperation between the Commission, Member States and SoHO competent authorities, to make specific information publicly available where required by Union law, and to ensure the proper functioning, security, traceability and quality of the information processed through the platform.

The current implementation of the EU SoHO Platform covered by this privacy statement concerns personal data necessary for user management, platform administration and the publication of information required by Union law. Your personal data will not be used for automated decision-making, including profiling. The processing of data concerning health is not foreseen in the current implementation.

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 or in the exercise of official authority vested in the Union institution or body.

The legal basis for the processing is Regulation (EU) 2024/1938, in particular Articles 73, 74 and 76, and Commission Implementing Regulation (EU) 2025/1467, in particular Article 8.

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

In order to carry out this processing operation SANTE.D.2 collects the following categories of personal data:

- Personal data identifying authorised actors and responsible persons for SoHO entities, namely the name, surname, affiliation, e-mail address and alphanumerical login code of the authorised actor, the activity log, and the name, surname and e-mail address of the responsible person for the SoHO entity.

- Personal data identifying SoHO Coordination Board members and alternates, namely the name, surname, name of institution of origin and declaration of interests.

Personal data are obtained both from the data subjects themselves through the EU SoHO Platform and from competent authorities, Member States and Commission services, where these enter, update or verify information in the platform in accordance with their roles. Where personal data are not obtained directly from the data subject, Article 16 of Regulation (EU) 2018/1725 applies.

5. How long do we keep your personal data?

SANTE.D.2 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely:

- Personal data identifying authorised actors, namely name, surname, affiliation, e-mail address and alphanumeric login code, are retained for up to 5 years after the authorised actor has lost the capacity as authorised actor of the EU SoHO Platform. The activity log is retained for up to 5 years after the authorised actor has lost that capacity.
- Personal data identifying the responsible person for the SoHO entity, namely name, surname and e-mail address, are retained for as long as that person holds the capacity as responsible person for the SoHO entity.
- Personal data identifying SoHO Coordination Board members and alternates, namely name, surname, name of institution of origin and declaration of interests, are retained for up to 15 years after the date on which the member or alternate no longer participates in the SoHO Coordination Board.

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

Personal data are stored in electronic form in the EU SoHO Platform within the European Commission's secure IT environment. 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 European 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.

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 responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

SoHO national authorities and SoHO competent authorities may access personal data in accordance with their roles, responsibilities and access rights under Regulation (EU) 2024/1938 and Commission Implementing Regulation (EU) 2025/1467.

The general public may access only those personal data that must be made public under Union law. In the case of SoHO Coordination Board members and alternates, this may include their name, surname, institution of origin and their declaration of interests or relevant parts thereof.

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.

The Commission will not transfer your personal data to third countries or international organisations in the context of this processing operation.

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. Where applicable, 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.

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.

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, SANTE.D.2, SANTE-CONSULT-D2@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: Record DPR-EC-36208 .