PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: DORIE database (documents related to institutional issues)

Data Controller: SG.F.4

Record reference: DPR-EC-00843

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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.

This privacy statement concerns the processing operation “DORIE database (documents related to institutional issues)” undertaken by the European Commission’s Secretariat-General, unit SG.F.4 ‘Institutional Affairs’ (hereafter, the Data Controller) as presented below.

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

Purpose of the processing operation: DORIE is an on-line database with a collection of documents related to institutional issues providing interested persons from the public with access to these documents. The processing of personal data on DORIE pursues the following purposes: (1) to manage users’ authentication and operate extended user functionalities, including personal settings (preferences), for those users who log in to DORIE, and (2) to reply to questions submitted through the DORIE on-line contact form.

(1) DORIE is freely accessible on the Europa website. Citizens have the option to log in to DORIE via secure authentication means and to create a user account to benefit from extended user functionalities (such as save results, create list of saved results) and to set personal preferences (such as language for browsing). The purpose of processing of personal data of users who choose to log in is to allow the Commission to manage users’ authentication and operate extended user functionalities for them, including personal settings (preferences).

(2) DORIE contains an on-line contact form (accessible from the homepage via a dedicated tab) where citizens can ask questions concerning the DORIE database. The purpose of processing in relation to the contact form is to identify the users who fill in the DORIE contact form and their organisation (should they choose to indicate which organisation they belong to), in order to:

- be able to reply to your questions concerning the DORIE database;
- avoid multiple responses;
- allow for a better monitoring of who uses the DORIE database and for what purpose;
- allow for a better understanding of what is of particular interest to the users and/or of what issues and difficulties they might face in using the database.

DORIE is operated on the portal of the Publications Office (for further details see record DPR-EC-00449 - Publications Office of the European Union website (OP Portal)). Your personal data will not be used for any automated decision-making including profiling.
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:

Public access to documents of the institutions is established by Article 15 of the Treaty of the Functioning of the European Union (TFEU) and specified further under Regulation N° 1049/2001, and in particular its Article 11 (provision of a public register). The DORIE on-line form allows users to ask questions about the DORIE database (collection of documents related to institutional issues) and the corresponding replies contribute to a proper understanding (of the functioning of) and use of the DORIE database.

(b) it is based on your consent, namely to process your personal data:

Insofar users log in to DORIE and create a user account and/or provide non-mandatory personal data (country, organisation, personal data provided spontaneously in the request), their processing is based on the user's consent in line with Article 5(1)(d) of Regulation 2018/1725.

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

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

**Login and User account**

Logging in to DORIE is only possible using EUlogin. This processing operation is covered by the record of processing DPR-EC-03187 - Identity & Access Management Service (IAMS). Please consult that record to check the types of data processed for identity and access management.

Logging in to the system is not mandatory and users can choose to consult the database as a non-identified public user. Logging in offers the advantage of accessing some extended user functionalities (such as saving results and creating a list with saved results), including the possibility to set some personal preferences (e.g. setting language for browsing).

When performing the first login on DORIE, every new user is invited to read the current privacy statement and confirm his/her agreement ('consent') to processing their data as described in it; without this consent the user can only access the system in a non-logged in mode. If the user gives his/her agreement, a 'My Account/My Profile' section is created where the date of consent is registered for each user and where the user can access the functionalities described in the previous paragraph. The user has the possibility to delete his/her Account/Profile at any time.

The following personal data are processed in relation to the user's account: user name or account, e-mail address, personal settings (e.g. language for browsing, etc), date of consent.

**On-line contact form**

When filling in the form, the following data have to be provided by the user:

- **Mandatory when filling in the online form:**
  - Family Name
  - First Name
  - E-Mail address
Optional when filling in the online form:

- Organisation
- Country

The text of the request may contain personal data which the requestor provides voluntarily. The provision of family name, first name and e-mail address is mandatory to fill in the contact form. Without this, the request cannot be sent and, therefore, no reply can be provided.

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

The personal data related to the user's account are kept in the Publications Office portal's internal database for as long as the user is active. The user has the possibility to delete his/her Account/Profile at any time. Personal data related to Identity and Access Management are kept in accordance with the record DPR-EC-03187 - Identity & Access Management Service (IAMS).

The data filled in by the users in the online form arrives by e-mail to the functional mailbox of the Data Controller and is then registered in the Commission internal document management system. The online form is not saved in the internal database of the system. The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of the processing operation, namely for as long as follow-up actions to the question submitted through the online form are necessary.

The emails stored in the functional mailbox are deleted automatically after 6 months, in line with the retention policy described in the record of processing DPR-EC-03610 ('Email system of the Commission').

The personal data processed in relation to requests made through the contact form are kept in the Commission internal document management system for 2 years, in accordance with the record for processing DPR-EC-00536 ('Management and (short- and medium-term) preservation of Commission documents') and the applicable retention rules set forth in the Commission Common Retention List.

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 on the servers of the European Commission or on the servers of its contractor(s). 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.

The Commission’s processors (contractors) are 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?**

DORIE is operated on the portal of the Publications Office maintained by the European Commission. 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.

The Publications Office Portal is hosted in Microsoft Azure Cloud in the EU. The Publications Office makes use of the following external contractors (processors) for operating the portal:

- SOFTWARE IMAGINATION & VISION S.R.L. Victoria Park Complex, Building C4, 2nd floor 73-81 Bucuresti-Ploiesti Drive, District 1 013685 Bucharest, Romania
- ARHS Spikesseed S.A. B198451 13, Boulevard du Jazz L-4370 Belvaux, Luxembourg Service
- Tremend Software Consulting S.R.L. Suite 2, Block 8-B, Entrance 1, 7th Floor, Apt. 32, 83 Cluj Street, District 1 013685 Bucharest, Romania

Other than the authorised processors mentioned above (and their possible sub-processors), 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.

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**Cookies**

Cookies are short text files stored on a user’s device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

The DORIE webpage is available on a website of the European Commission, which uses cookies. The cookies employed by the Commission on the registrant’s device for that purpose will be covered by the cookie policy of the Commission, which is available here: [https://ec.europa.eu/info/cookies_en](https://ec.europa.eu/info/cookies_en).

When you visit the website(s) of DORIE, we will keep the browser history of your visit for a maximum of 13 months. This information will then be deleted. The collection, aggregation and anonymising operations are performed in the data centre of the European Commission under adequate security measures.

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission’s websites on EUROPA. More information is available at [https://european-union.europa.eu/europa-analytics_en](https://european-union.europa.eu/europa-analytics_en). Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission’s control. These cookies are not used for any purpose other than those described here.

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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 processing of personal data by logging in to DORIE and creating a user account and/or providing optional personal data as described under heading 4 above, 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.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

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, SG-UNITE-F-4@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 her. 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-00843.