



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**This notice provides information about  
the processing and protection of your personal data.**

### **Processing activity:**

*Publication of (i) meetings held by Commissioners, their Cabinet members and Directors-General with interest representatives, and (ii) an overview of mission expenses per Commissioner*

### **Data Controller:**

*Secretariat-General, Unit C1 'Transparency, Document Management & Access to Documents'*

**Record reference:** *DPR-EC-02047*

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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<sup>1</sup>.

This data protection notice explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of that personal data, 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 controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

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

Purpose of the processing: On grounds of transparency, the Commission makes public (i) information on meetings held by Members of the Commission (Commissioners), members of their Cabinet and Directors-General of the Commission with interest representatives (organisations or self-employed individuals) on issues relating to decision-making and policy implementation in the Union; (ii) an overview of mission expenses per Commissioner.

The Commission processes personal data within the meaning of Article 3, point (3), of Regulation (EU) 2018/1725 in order to fulfil its above transparency obligations. The types of personal data processed is described in heading 4 of this notice.

The controller as well as Commission staff members assisting Commissioners, members of their Cabinets and Directors-General of the Commission process the personal data for the specified publication purposes.

The information on meetings and mission expenses is processed in the Commission internal dedicated IT system (ATMOS).

The information on meetings is published through ATMOS on the Europa website (webpage of the Member of the Commission or Directorate-General of the Commission concerned). It is also published as a list (in pdf. format) in the profile of the interest representative (organisation or self-employed individual) concerned in the [Transparency Register](#) established by the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register (OJ L 207, 11.6.2021, p. 1). The Commission makes further available on [Data.europa.eu](#) datasets that enable the public to download the lists of Commission meetings with interest representatives in machine-readable XML and/or Excel format.

The information on mission expenses is published through ATMOS on the relevant Europa webpage of the Member of the Commission concerned.

The personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, the European Ombudsman or the European Court of Auditors.

The personal data is not used for any automated decision-making including profiling.

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<sup>1</sup> 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39.

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

We process your personal data because such processing is necessary:

(a) for the performance of a task carried out in the public interest / in the exercise of official authority vested in the Commission, in accordance with point (a) of Article 5(1) of Regulation (EU) 2018/1725;

(b) for compliance with (a) legal obligation(s) to which the Commission is subject, in accordance with point (b) of Article 5(1) of Regulation (EU) 2018/1725.

The Union law that is the basis for that processing is:

- Article 11(1) and (2) of the Treaty on European Union (TEU) and Article 15(1) of the Treaty on the Functioning of the European Union (TFEU);
- Commission Decision 2014/838/EU, Euratom of 25 November 2014 on the publication of information on meetings held between Directors-General of the Commission and organisations or self-employed individuals<sup>2</sup>;
- Commission Decision 2014/839/EU, Euratom of 25 November 2014 on the publication of information on meetings held between Members of the Commission and organisations or self-employed individuals<sup>3</sup>;
- Commission Decision of 31 January 2018 on a Code of Conduct for the Members of the European Commission (C(2018)0700)<sup>4</sup>, and in particular Articles 6(2) e and 7(1) thereof, on the publication of information on mission expenses and meetings with interest representatives respectively.

The names of individuals (acting on behalf of organisations or self-employed individuals) or Commission officials (other than members of the Cabinets) attending meetings are not made public unless those individuals have unambiguously given their consent<sup>5</sup>, in accordance with point (d) of Article 5(1) of Regulation (EU) 2018/1725.

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

The processing concerns the following categories of personal data:

Concerning the publication of information on meetings held with interest representatives:

- Name of the Commissioner, Cabinet member or Director-General;
- Name of a self-employed individual (as registered in the Transparency Register);
- Date of the meeting, the location and the subject of the meeting.

The data for the field 'name of the organisation or self-employed individual' is retrieved from the Transparency Register (record of processing activity notified and published under reference [DPR-EC-00069 'Transparency Register'](#)).

The Cabinet of the President of the Commission may also publish the function(s) of the (main) representative(s) of an organisation (for instance, a CEO or President of an organisation) holding

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<sup>2</sup> OJ L 343, 28.11.2014, p. 19.

<sup>3</sup> OJ L 343, 28.11.2014, p. 22.

<sup>4</sup> OJ C 65, 21.2.2018, p. 7.

<sup>5</sup> Article 5 of Commission Decisions 2014/838/EU, Euratom and 2014/839/EU, Euratom.

a meeting with the President of the Commission on grounds of transparency and the information of the general public.

Concerning the publication of information on mission costs:

- Name of the Commissioner to which the mission costs relate;
- Location, date and purpose of the mission;
- Daily allowances;
- Travel costs;
- Accommodation costs;
- Miscellaneous costs.

That information is extracted from the missions integrated processing system (MIPS) notified and published under record of processing [DPR-EC-00990 'Gestion des missions et des déplacements professionnels, y inclus du système MIPS \(Mission Processing System\), OBT \(Online Booking Tool\) et des contrats Agence\(s\) de voyages, Assistance et Assurance mission et Carte de crédit professionnelle'](#). In addition, ATMOS includes further information on the context of the mission, for example the types of meetings held or events attended during the mission, relevant links to Commissioners' social media accounts and press releases and the names and/or functions of individuals met during the mission (usually public figures acting in a public capacity).

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

The personal data are kept in ATMOS IT database and on Europa webpages for the whole duration of a College's mandate, in accordance with the Common Commission-level Retention List for European Commission files ([SEC\(2019\)900](#)). At the end of this administrative retention period, the personal data published on Europa webpages are stored on the long term for archiving purposes in the public interest, in line with the Commission [Europa Web Guide](#). After the end of the College mandate, the personal data processed in ATMOS are kept on the long term to support the digital archiving of Europa webpages and subject to appropriate technical and organisational measures.

**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. 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 European Commission.

In order to protect 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 activity.

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

The information on meetings held by Commissioners, their Cabinet members and Directors-General with interest representatives, as well as on the mission expenses per Commissioner, is published online and is therefore available to the general public.

**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.

Insofar the right to object to the processing of your personal data is concerned, the exercise of that right has to be based on grounds relating to your particular situation.

To the extent that the processing of your personal data is based on consent, you can withdraw your consent at any time by notifying the controller. Such 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 controller, or the Data Protection Officer of the Commission. You can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Upon request to exercise any of your above-mentioned rights, you will be provided with information within one month of receipt of your request. That period may be extended by two further months where necessary, taking into account the complexity and number of requests.

## **9. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, if you have comments, questions or concerns, or if you would like to submit a complaint regarding the processing of your personal data, please contact the controller, Secretariat-General, Unit C1 'Transparency, Document Management & Access to Documents' at: [SG-ATMOS@ec.europa.eu](mailto:SG-ATMOS@ec.europa.eu).

### **- The Data Protection Officer of the Commission**

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

### **- The European Data Protection Supervisor**

You have the right to have recourse, i.e. you can lodge a complaint to the European Data Protection Supervisor via [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.

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

The Commission Data Protection Officer publishes the register of all processing activities in the Commission. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing activity has been included in the Data Protection Officer's public register with the following Record reference: [DPR-EC-02047](#).