



EUROPEAN COMMISSION

European Climate, Infrastructure and Environment Executive Agency

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

In accordance with Article 31 of the [Data Protection Regulation for EUIs](#)¹ (hereinafter referred to as the Regulation), individuals whose personal data are processed by the European Climate, Infrastructure and Environment Executive Agency (hereinafter referred to as CINEA or Agency) in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing activities.

Record No: 2021-004/C02-PROG-08
Created on (date): 18/02/21
Last update (date): 20/12/23

NAME OF THE PROCESSING ACTIVITY

- Processing of personal data in the framework of the Bridge and ETIP-SNET initiatives.

GROUND FOR THE RECORD:

- Regularisation of a data processing activity already carried out
- Record of a new data processing activity prior to its implementation
- Change of a data processing activity (e.g.: update of a record).

¹ Regulation (EU) 2018/1725 of 23 October 2018

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION

1.1. Name and contact details of controller

- a. CINEA C.2
Chaussée de Wavre 910
W910
BE – 1049 Brussels
- b. the Head of Unit C2
- c. Email: CINEA-HE-Energy@ec.europa.eu

Name and contact details of the Data Protection Officer (DPO)

CINEA DPO
CINEA-DPO@ec.europa.eu

1.2. Name and contact details of joint controller (where applicable)

Not applicable

1.3. Name and contact details of processor (where applicable)

The management of the content of the websites (such as newsletter and meeting minutes, etc.) is handled by a consortium of external contractors led by PwC EU Services EESV located in CULLIGANLAAN 5 1831 MACHELEN, BELGIUM under the service contract CINEA/2023/OP/0001/SI2.901723, which is managing and coordinating the activities of BRIDGE and ETIP SNET Initiatives from the 6th of September 2023 till the 5th of September 2026.

- Link to PwC [Privacy Policy](#)

The management of the service to notify subscribers of information relating to their topics of interest (Newsroom) is processed by the Commission Services (DG CNECT) acting as processor².

1.4. Purpose of the processing

The purpose is to process personal data (e.g. names, email addresses, etc) that are needed for the activities (e.g. subscription to newsletters, recording of meeting minutes, participation to working groups, task forces, events, webinars etc) which are associated to the two websites on the europa.eu domain that are linked to the respective Bridge and the ETIP-SNET initiatives funded under the Horizon 2020 and Horizon Europe programme managed by CINEA.

1.5. Legal basis for the processing

- Council Regulation (EC) 58/2003 of 19 December 2002 laying down the statute for executive agencies to be entrusted with certain tasks in the management of Community programmes;
- Commission Decision C(2021) 953 of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the European

² This specific processing operation has been included in the EC DPO's public register with the following Record reference: DPR-EC-00841.

Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU;

- Commission Decision C(2021)947 of 12 February 2021 delegating powers to the European Climate, Infrastructure and Environment Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of transport and energy infrastructure; climate, energy and mobility research and innovation; environment, nature and biodiversity; transition to low-carbon technologies; and maritime and fisheries; comprising, in particular, implementation of appropriations entered in the general budget of the Union and those stemming from external assigned revenue;
- Regulation (EU) No 1291/2013 of the European Parliament and of the Council of 11 December 2013 establishing Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decision No 1982/2006/EC;
- Regulation (EU) No 1290/2013 of the European Parliament and of the Council of 11 December 2013 laying down the rules for participation and dissemination in "Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020)" and repealing Regulation (EC) No 1906/2006);
- Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013 (Text with EEA relevance).

1.6. Categories of data subjects

Any person who has subscribed to any BRIDGE and ETIP-SNET newsletters and/or any person, who has agreed to become member to the ETIP-SNET and BRIDGE Governance and Working groups.

1.7. Categories of personal data

- *First and last name;*
- *Place of work (e.g. company);*
- *email address;*
- *Consent to process personal data;*
- *Passwords and user names;*
- *Biographical background;*
- *Photo;*
- *EU login.*

In addition to the above list, the following data is also processed for the subscribers to the newsletters:

- *Organisation;*
- *Position/function;*
- *Country;*
- *Stakeholder Group.*

No data such as IP addresses is collected for this purpose.

1.8. Retention time (time limit for keeping the personal data)

a) Retention

Time for keeping the data is in any case limited as long as necessary with the regard to the purpose(s) of the processing and is deleted as soon as it is not needed any longer.

For website: the common retention list of the Commission (SEC (2019) 900/2 - ARES(2019)4374520 – 09/07/2019)' provides for an administrative retention period of maximum 2 years in principle (see section 9.4.2 Communication strategy & tools) . These two years will be counted from the closure of the website.

For subscription to newsletters, working groups, etc, data is kept as long as the data subject does not unsubscribe and as long as the relevant activities (newsletters, working groups, etc.) are operating. Should the data subject unsubscribe, the data will be erased from the database as soon as possible (maximum within 10 working days).

All personal data collected via the processor in charge of Newsroom is kept as long as:

- the subscriber consents to the processing and until the subscriber unsubscribe himself or herself or requests the controller to delete his/her account,
- or 5 years until the last interaction of the data subject with Newsroom. Receiving a newsletter is not considered an "interaction" for this purpose. "Interactions" are actions from the subscriber such as subscribing, confirming a subscription, updating a subscription, etc.

When a newsletter/notification system stops, Newsroom deletes all relevant personal data.

b) Storage period: the period of storage is the same as the retention period (see above).

c) Is any further processing for historical, statistical or scientific purposes envisaged, which would go beyond the normal retention period: No

1.9. Recipients of the data

Only the relevant data is disclosed on a need to know basis and in line with the consent given to the following recipients:

- Any authorized staff members of the Agency (e.g. Operational Unit in charge of the initiatives in CINEA for the purpose described above, Director, financial officers for payment of the activities, Legal Sector, DPO and/or Internal Controller in case of audit or proceedings, etc.);
- Where applicable, the contractor (and its subcontractors if applicable) selected for the management of registrations or any other relevant activities;
- For the Newsroom facility, DG CNECT in the European Commission acting as processor;
- Relevant Commission Services (e.g. Parent DG's , etc) dealing with the initiatives and related communication issues (and when applicable their relevant contractors);
- Relevant stakeholders (e.g. participants commenting the minutes or when sharing list of participants, etc ...);
- General public (for data published on the website or via social media but only in case of explicit consent.

In addition, data maybe disclosed to public authorities, which are not regarded as recipients in accordance with Union and Member State law. The processing of the data by these public authorities shall be in compliance with the applicable data protection rules according to the purpose of the processing:

- European Court of Justice or a national judge, as well as the lawyers and the agents of the parties in case of a legal procedure;
- European Ombudsman;

- European Data Protection Supervisor (EDPS);
- European Anti-Fraud Office (OLAF);
- The Internal Audit Service of the Commission
- The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union of the EC Treaty
- The European Public Prosecutor's Office

1.10. Transfers of personal data to third countries or international organisations

-Not applicable. The contractor has confirmed that they do not processing any data outside the EEA.

1.11. Description of security measures

Data are stored on the EC servers, the consortium is not going to store any data on its own servers.

Within the Agency, data is only accessible via restricted access on an individual need to know basis and through User-ID and password. Personal data resides on the servers of the European Commission, which abide by strict security measures implemented by DG DIGIT to protect the security and integrity of the relevant electronic assets. The Agency is bound by Commission Decision 2017/46 of 10/1/17 on the security of communications & information systems in the EC. The use of passwords are protected by authentication system.

Access to all collected personal data within the frame of the Consortium is also only permitted to those referred to above (see point 1.10) using a User ID / Password.

The list of subscribers or data related to the participants are not public nor published and fall under a restricted access on a need to know basis unless there is an explicit consent given by the data subject concerned to disclose it publically.

The EU Cookie Compliance Module under Drupal CMS, will be used, which enables the configuration of the cookie banner that informs visitors about the use of cookies. This banner is to include a link to the cookie policy and to the option of Agree/Decline the described cookies.

1.12. Data Protection Notice

A Data Protection Notice (DPN) relevant to this data processing activity is available on the CINEA website (Europa domain) where these initiatives are published: <https://ec.europa.eu/energy/etip-snet> and <https://ec.europa.eu/energy/bridge-projects>

This DPN is also provided to the participants when collecting their consent to process their data when registering to a newsletter, a working group or relevant event/activity.