



EUROPEAN COMMISSION

Innovation and Networks 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 Innovation and Networks Executive Agency (hereinafter referred to as INEA 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.

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NAME OF THE PROCESSING ACTIVITY

Use of personal data for internal communication activities (INEA internal website (INEAnet), internal events, brochure etc) and external communications purposes

GROUND FOR THE RECORD:

- Regularisation of a data processing activity already carried out
This record replaces notifications COMM - 3 & 5 issued under the previous Data Protection Regulation
- 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

² The Record number in the central register will be provided during the consultation with the DPO

1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION³

1.1. Name and contact details of controller

- a. INEA R1
Chaussée de Wavre 910
W910 04/136
BE – 1049 Brussels
- b. Head of Unit R1
- c. Email: inea-communication@ec.europa.eu

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

INEA DPO
INEA-DPO@ec.europa.eu

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

Not applicable

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

Not applicable

1.5. Purpose of the processing

Purpose is twofold, it aims at processing personal/professional details on the Agency intranet and at processing photos and videos for internal/external communications purposes. The aims are as follows:

- To improve communication within the Agency and to allow staff members to identify colleagues, find out what they do and where they work and share pictures and videos of professional or social events organised by the Agency to enhance its working atmosphere.
 - The Who's who section on the intranet, which is organised by department, unit & sector, contains a photo and the professional details of staff in active service to facilitate contacts among them;
 - The intranet includes also in the relevant parts ("News", Front page, and "IN the House" section, etc.), pictures and short video presentations on the specific activities of the Agency to help illustrate its work or social events, which are available for a limited period. This aims at improving the content offered by the intranet site: a picture or a video can be used to illustrate rapidly and effectively tasks or events that are difficult to explain on paper. This processing contributes to a more efficient functioning of INEA in view of its rapid increase in new personnel and to the promotion of its activities.
- To have information necessary to communications colleagues to contact relevant INEA Colleague for communication purpose (collect staff consent about photo dissemination, promote INEA's work, publicise events, update content on webpage, issue internal brochures, e.g.: "W910" etc.).

³ This part of the record will be published on INEA website and should be aligned with the information provided in the DP notice

- To use photos and videos taken of data subjects at internal or external events organised by the Agency for internal and external communication purposes (e.g. INEA social media channels, publications etc.) to represent the Agency to the outside world and promote the Agency's values and activities as well as the results achieved.

1.6. Legal basis for the processing

Article 5.1 (a) & (d) of the Regulation:

- 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 data subject has given consent to the processing of his or her personal data for one or more specific purposes

The lawfulness of the processing is based on the following:

- 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 2013/801/EU of 23 December 2013 establishing the Innovation and Networks Executive Agency and repealing Decision 2007/60/EC establishing the Trans-European Transport Network Executive Agency as amended by Decision 2008/593/EC;
- Commission Decision C(2013)9235 of 23 December 2013 delegating powers to INEA with a view to the performance of tasks linked to implementation of the Union programmes in the field of transport, energy, telecommunications infrastructure and in the field of transport and energy research and innovation, comprising in particular implementation of appropriations entered in the general budget of the Union;
- [INEA Multi-Annual Communication Strategy 2019-2021](#)
- [European Commission strategic plan \(DG COMM\)](#)
- Memorandum to the Commission towards the e-Commission: Implementation Strategy 2001–2005 [SEC (2001) 924];
- Communication to the Commission on e-Commission 2006-2010: enabling efficiency and transparency.

1.7. Categories of data subjects

All INEA staff (Seconded Officials, Temporary and Contractual Agents, Interns, Interimaires and Consultants).

There may be photos, videos & reference to personal data such as names & functions of non INEA-staff taken during INEA related events but these are covered by the record relating to external communication of INEA.

1.8. Categories of personal data

The intranet contains information and personal data of INEA staff, collected by the Human Resources Sector in R4, the Logistics Sector in R4, the IT Sector in R4, the Communication Team in R1, or the staff members themselves, namely:

- Picture
- Name and surname
- Job title and description of the duties
- Office location

- Phone number
- Email address
- Nationality(ies)
- Spoken languages
- Abbreviated initials
- Birth date
- Pictures and videos (recordings and live transmission) on the news page (front page), and relevant sections such as “IN the house” section on pertinent events of the Agency. For illustration purposes, there may be pictures in some cases taken from the public domain in compliance with the relevant copyrights & rights (e.g. Shutterstock) but this does not fall under this record.

The Communication Team’s database contains the following data, which may be used for in house communication activities (e.g. internal brochure “W910”, etc.):

- Pictures (edited and unedited)
- Videos (recordings and live transmission, edited and unedited)
- Name and surname
- Nationalities
- Location

Personal data concerning INEA related events for external communication purposes of INEA such as photos, videos & reference to personal data such as names & functions.

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

A) Retention period:

Profile pictures on INEAnet are displayed as long as the person is an Agency’s staff member in active employment or does not request its removal. Upon departure from the Agency, the profile picture will be unpublished from the Agency’s intranet.

The Agency’s staff can access the intranet and can update/delete his/her picture and additional personal data at any time. This update is immediately executed and visible. In case of request for removal of a video or a picture including an unambiguously identifiable representation of the staff member, including the profile picture on INEAnet, a minimum period of at least 2 (two) working days is required to address the data subject’s query. This time will start once the service request ticket in the INEA’s Service Desk (<https://helpdesk.inea.cec.eu.int>) is submitted.

For other personal data (from events, etc.), data is kept only as longer as necessary (for example for the event duration etc.)

The Agency applies the EC retention periods in line with the revised common list of 2019 as regards communication, namely:

- 5 years as regards events
- 2 years as regards internal website

b) Storage period:

The storage period is in line with the abovementioned period.

c) Is any further processing for historical, statistical or scientific purposes envisaged, which would go beyond the normal retention period?

No

1.10. Recipients of the data

Concerning personal data processed via the intranet, the recipients are the INEA staff members and any staff member of the Commission services and other Executive Agencies, who have access to the local intranet of INEA via the MYIntraComm services.

Regarding data contained in the Communication database/ file, access is limited to the Communication Team for its work: The signed authorisation sheets (individual agreement signed by each staff members) are stored electronically in the relevant file by the Communications Sector and can only be accessed on a need to know basis.

Some data such as pictures (Christmas party etc.) of recent events concerning the whole agency are available on the common agency drive for a limited period of time & as long as necessary (2 years).

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

Not applicable

1.12. Description of security measures

Access to data is safeguarded by the internal European Commission IT systems, which protect against external users accessing the data. Access to the Intranet is protected via the Commission security measures (EU LOGIN).

1.13. Data Protection Notice

A Data Protection Notice (DPN) relevant to this data processing activity is available on the [intranet](#) and is provided within the authorisation sheet that each new staff member is invited to sign upon entry into function (see Annex 2).