



## 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](#)<sup>1</sup> (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 the 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 Number: 2019-002/R1-COMM-01

Created on (date): 22/03/19

Last update (date): 04/03/21

**NAME OF THE PROCESSING ACTIVITY**

Use of personal data for internal communication activities (CINEA internal website (CINEAnet), internal events, brochure, and so on) 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).*

<sup>1</sup> Regulation (EU) 2018/1725 of 23 October 2018

## 1. MANDATORY RECORD UNDER ARTICLE 31 OF THE REGULATION<sup>2</sup>

### 1.1. Name and contact details of controller

- a. CINEA A1  
Chaussée de Wavre 910  
BE – 1049 Brussels
- b. Head of Unit A1
- c. Email: [cinea-communication@ec.europa.eu](mailto:cinea-communication@ec.europa.eu)

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

CINEA DPO

[CINEA-DPO@ec.europa.eu](mailto:CINEA-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 CINEA 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 CINEA Colleague for communication purpose (collect staff consent about photo dissemination, promote CINEA's work, publicise events, update content on webpage, issue internal brochures, e.g.: "W910" etc.).
- To use photos and videos taken of data subjects at internal or external events

---

<sup>2</sup> This part of the record will be published on CINEA website and should be aligned with the information provided in the DP notice

organised by the Agency for internal and external communication purposes (e.g. CINEA 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 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 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;
- [CINEA Multi-Annual Communication Strategy 2021-2023](#)
- [European Commission strategic plan \(DG COMM\)](#)

## 1.7. Categories of data subjects

All CINEA staff (Seconded Officials, Temporary and Contractual Agents, Interns, Interim Staff, Intramuros and Consultants).

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

## 1.8. Categories of personal data

The intranet contains information and personal data of CINEA staff, collected by the Human Resources Sector in A4, the Logistics Sector in A4, the IT Sector in A4, the Communication Sector in A1, or the staff members themselves, namely:

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

- Phone number
- Email address
- Personal number
- 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 CINEA related events for external communication purposes of CINEA 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 CINEAnet 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 CINEAnet, 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 CINEA’s Service Desk (<https://helpdesk.cinea.cec.eu.int>) is submitted.

For other personal data (from events, etc.), data is kept only as long 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 CINEA staff members and any staff member of the Commission services and other Executive Agencies, who have access to the local intranet of CINEA via the MYIntraComm services.

Regarding data contained in the Communication database/ file, access is limited to the Communication Sector 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).

For personal data processed via the website or social media based on consent, the recipients are persons, who access to these communication means.

In case of audits or proceedings, etc., personal data may be provided to CINEA's Internal Controller, DPO, Legal Sector, Staff Committee, and so on.

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

- The 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;
- IDOC in line with Commission Decision of 12 June 2019 laying down general implementing provisions on the conduct of administrative inquiries and disciplinary proceedings - C(2019)4231 and Commission Decision (EU) 2019/165 of 1 February 2019 Internal rules concerning the provision of information to data subjects and the restriction of certain of their data protections rights in the context of administrative inquiries, pre-disciplinary, disciplinary and suspension proceedings;
- The competent Appointing Authority in case of a request or a complaint lodged under Articles 90 of the Staff Regulations;
- OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999
- The Internal Audit Service of the Commission within the scope of the tasks entrusted by article 118 of the Financial Regulation and by article 49 of the Regulation (EC) No 1653/2004
- 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 and Article 20, paragraph 5 of Regulation (EC) No 58/2003
- The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union

- The European Data Protection supervisor in accordance with Article 58 of the Regulation (EC) 2018/1725
- The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office.

**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