



RECORD OF PERSONAL DATA PROCESSING ACTIVITY

HaDEA's Staff Events

Record No: COM.01 **Initial approval by Data Controller:** [ARES registration date](#)

Update (s) (if applicable): N/A

NAME OF THE PROCESSING ACTIVITY

HaDEA's Staff Events

IDENTIFICATION OF THE DATA CONTROLLER

Head of HaDEA Unit C.3 "Staff, Communication and Support"

GROUND FOR THIS RECORD (*select relevant ground*)

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place**
- Change/Amendment/ Update of an already existing previous record

INFORMATION ON THE PROCESSING ACTIVITY

of HaDEA's Staff Events

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**¹ on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

Head of HaDEA Unit C.3 "Staff, Communication and Support", Place Charles Rogier 16, B-1049 Brussels, BELGIUM and can be contacted at HaDEA-COMMUNICATION@ec.europa.eu.

1.2 The contact details of the Data Protection Officer (DPO)

HADEA-DPO@ec.europa.eu

1.3 Joint controller:

Not applicable

1.4 The following entity(ies) is/are acting as Processor(s):

The external service providers vary according to the specific needs of the Agency. The name of the provider(s) if any will be indicated in the Data Protection Notice.

1.5 Description and purpose(s) of this processing:

The purpose of the processing activity is to ensure proper organisation and management and participation of HaDEA staff to events, meetings and in general activities organised by HaDEA, either at and/or outside HaDEA's premises.

The organisation of events and meetings practically involves the following activities:

- management of contacts and mailings lists for invitations, registration to the event and to the associated events and activities and management of their participation online;
- handling of participation requests and feedback;
- managing catering and preparation of meals;
- preparation and distribution of preparatory materials, meeting reports, news items and publications to the participants;
- publication and communication activities about the event/meeting on HaDEA intranet and/or on the HaDEA website, and/or social media;
- shooting of photos and videos and facilitation of audio or video recording during the event/meeting including for dissemination purposes (e.g. publication of pictures on HaDEA intranet) in order to enhance cooperation, networking, facilitate communication on specific topics among the members of the Agency;
- management of follow-up meetings and other related follow-up actions, such as the collection of feedback through evaluation surveys, the distribution of contact lists, invitations, news, reports, other publications and information material, and sending of emails informing on future activities related to the event;

¹ [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 295/39 of 21.11.2018).

- management of the event database/community – for receiving further information related to the topic and activities of the event;
- collection of event statistics.

1.6 The legal basis for the processing based on Article 5(1) of Regulation (EU) 2018/1725 is/are:

- (a) the 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 body²;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions, bodies or agencies (Recital (22) of Regulation (EU) 2018/1725) laid down in Union law;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- (c) the processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (d) the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes³;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

Furthermore, when it comes to the processing of special categories of personal data, the processing operation is lawful under Article 10(2)(a) of the Regulation (EU) 2018/1725 provided data subjects have given prior explicit consent.

1.7 The categories of data subjects

- Agency staff (Contractual and temporary staff in active position)
- Visitors to the Agency
- Applicants
- Relatives of the data subject
- Complainants, correspondents and enquirers
- Witnesses
- Beneficiaries
- External experts
- Contractors
- Other, please specify: other types of HaDEA personnel (e.g., interimaire, trainees, external service providers), Commission or other EU institutions/bodies' staff.

² Meetings and other events organised by HaDEA may relate to any of the tasks of the Agency listed under Article 4 of the Commission Decision C(2021)948 of 12.2.2021 delegating powers to the European Health and Digital Executive Agency with a view to the performance of tasks linked to the implementation of Union programmes in the field of EU4Health, Single Market, Research and Innovation, Digital Europe, Connecting Europe Facility – Digital, comprising, in particular, implementation of appropriations entered in the general budget of the Union.

³ As regards photos, image and voice recording.

1.8 Categories of personal data

a) Categories of personal data:

Contact details of the participants/speakers: First name, last name, title, function, professional e-mail address and phone number. All these personal data are mandatory for the purposes outlined above.

In addition, the following non-mandatory personal data may be collected based on consent: pictures and audio-visual material taken during the event and sensitive data related to dietary requirements.

The data subjects might provide personal data related to specific dietary requirements, such as allergies, on a need-to-know basis via a dedicated functional mailbox to which only authorised staff in HR Sector or Communication Sector might have access to.

Upon registration to the event (e.g., depending on the event, at the registration desk at the day of the event, by accepting via the yes/no button of the Outlook invitation or via a dedicated page on Intranet), data subjects can give their explicit consent to have their image/voice recorded, photographed and published on related communication channels.

In the absence of their consent, the organiser will try to find a suitable alternative, so that they can fully take part in the event. In particular, in case they don't want to appear on pictures and audio-visual material (non-mandatory personal data), they will be provided with a sticker to wear visibly at the event. For online events, data subjects will be able to switch off the microphone and camera.

b) Categories of personal data processing likely to present specific risks: not applicable.

c) Categories of personal data whose processing is prohibited, with exceptions (art. 10):

Sensitive data related to dietary requirements can only be processed based on the explicit prior consent of the data subject.

d) Specify any additional data or explanatory information on the data being processed, if any: not applicable.

1.9 Retention period (maximum time limit for keeping the personal data)

- All personal data collected for and during the event will be kept by HaDEA for 3 months from the date of the event, after that the data will be deleted.
- All sensitive data will be deleted one month after the date of the event.
- For personal data published on the Agency's intranet: Names/pictures/videos/recordings of social events: 3 months.
- Names/pictures/videos/recordings of professional meetings and events: 2 years.

Is any further processing for historical, statistical or scientific purposes envisaged?

yes no

1.10 The recipient(s) of the data

The recipients to whom the personal data will or might be disclosed are:

- The HaDEA Director's office;
- Authorised staff of the HaDEA People Sector and Communication Sector;

- Authorised staff of HaDEA in charge of the organisation and follow-up of the event;
- Other event organisers (e.g. contractors);
- Participants to the events;
- Pictures and audio-visual material published on the Agency's Intranet are accessible to all Directorates-General of the European Commission and Executive Agencies as well as other agencies/bodies, present on MyIntracomm;
- In case of audits or proceedings, etc., HaDEA's Internal Controller, Data Protection Officer, Legal Affairs Sector, etc.

In addition, in case of control or dispute, personal data can be shared with and processed by the bodies charged with a monitoring or inspection task in application of Union law in compliance with the applicable data protection rules and within the scope of their tasks entrusted by the relevant legislation. This includes, in particular, the following recipients:

- Bodies in charge of a monitoring or an inspection task in application of Union law (e.g. Internal Audit Service (IAS), Court of Auditors, etc.);
- 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;
- The European Antifraud Office (OLAF) in case of an investigation conducted in application of Regulation (EC) No 1073/1999;
- 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 (EDPS) in accordance with Article 58 of Regulation (EC) 2018/1725;
- The European Public Prosecutor's Office (EPPO) 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

Personal data **will not be transferred to third countries or international organisations.**

1.12 The processing of this personal data **will not include** automated decision-making (such as profiling).

1.13 Description of security measures

The European Commission's IT systems used by the Agency abide by the Commission's security guidelines. The Agency complies with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

1. Organisational measures:

A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DG DIGIT.

Organisational measures include appropriate access rights and access control. As a rule within the Agency, access to information systems, the file system or offices are subject to a series of authorisations where the person granting the access is different from the person requesting or authorising the access - except in limited cases of delegation. The responsible person in the unit in

charge of this action (processing operation of the current record) collects and places personal data in electronic format on the secured drive of the Unit with restricted access on a need to know basis. All Agency staff and its contractors are bound by confidentiality obligations. The need to know principle applies in all cases.

2. Technical measures

State of the art technical cybersecurity measures are implemented in the corporate systems, according to the security needs. Those measures are in constant evolution.

1.14 Data protection Notice

Data Subjects are informed on the processing of their personal data, via a **data protection notice, on their rights :**

- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- of recourse at any time to the HaDEA Data Protection Officer at HADEA-DPO@ec.europa.eu and to the European Data Protection Supervisor at <https://edps.europa.eu>.

Request from a data subject to exercise a right will be dealt within **one month**.

Data subjects' right to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the **applicable [Restriction Decision](#)** in accordance with Article 25 of Regulation (EU)2018/1725.