

ELRC Data Protection Notice

Within the CEF Digital Programme the Commission of the European Communities (referred to as “the European Commission”) has concluded several contracts (SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16)) for the set-up and maintenance of a permanent Language Resource coordination and collection mechanism – the European Language Resource Coordination (ELRC). The ELRC consortium consisting of the German Research Centre for Artificial Intelligence (DFKI, www.dfki.de), CrossLang (www.crosslang.com), the Evaluations and Language Resource Distribution Agency (ELDA, www.elda.org), the Institute for Language and Speech Processing (ILSP/Athena R.C., www.ilsp.gr) and Tilde (www.tilde.com) are jointly responsible for the collection and processing of personal data. The European Commission is committed to goal- and risk-oriented information privacy and the fundamental right to the protection of personal data. In this data protection policy we inform you about the processing of your personal data when visiting our web site and/or using our services.

Controller

ELRC Consortium (DFKI, CrossLang, ELDA, ILSP/Athena R.C., Tilde) acting on behalf of the European Commission

Contact:

ELRC Secretariat

Phone: +49 (0)681 / 857 75-5285, E-Mail: info@lr-coordination.eu

Data protection officer (DPO) of the Commission

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

Purpose of processing

Within the ELRC, the following personal data is processed:

1. Requests sent to the ELRC and CEF AT Legal and Technical Helpdesks and the ELRC Secretariat (including names, email addresses, organisational affiliations, phone numbers, addresses)
2. Coordination of and communication with the Language Resource Board (LRB) including collection of personal information (names, email addresses, organisational affiliations, phone numbers, addresses)
3. Registration, preparation, conduct and follow-up for meetings and events registration, in particular for Q&A Online Sessions, LRB Meetings, ELRC Country Workshops, Technology Workshops and Annual Conferences (collection of names, email addresses, organisational affiliations, phone numbers, addresses)
4. ELRC Newsletter Subscriptions (collection of names, email addresses, organisational affiliations)
5. Processing of personal data related to the maintenance of ELRC websites including IP addresses, names, email addresses, organisational affiliations); currently use of Matomo Analytics
6. Processing of personal data from data providers on the ELRC-SHARE Repository, i.e. collection of names, email addresses, organisational information, IP-addresses
7. Processing of personal data through social media, i.e. collection of names, email addresses, organisational information, phone numbers

Anonymous and protected usage

Visit and usage of our web site are anonymous. At our web site personal data are only collected to the technically necessary extent (e.g. for registration to events, the upload of language resources, etc.). The processed data will not be transmitted to any third parties or otherwise disclosed, except on the basis of concrete legal obligations or contractual obligations within the ELRC (SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16)). Within our information offering we do not embed information or service offerings of third party providers.

Use of cookies

We collect information that tracks e.g. visitor's behaviour on our website but that does not identify you as a person. Information is collected automatically (e.g. using information from your browser, web beacons, pixel tags). Information we may collect from your browser includes your IP address, your browser type and language, access times and similar. When you visit our website, we may assign your computer one or more cookies, to facilitate access to our site and to personalize your online experience.

Cookies are small files that are being stored by your web browser. The cookies used on our web site do not harm your computer and do not contain any malicious software. They offer a user friendly and effective usage of our web site. We do not use cookies for marketing purposes. We transmit so-called session cookies to your web browser. They are valid only for the duration of your visit on our web site and they do not have any meaning outside of our web site. The session cookies are needed in order to identify your session with a unique number during your visit and to transmit our contents in your preferred language. At the end of your visit the session cookies will be automatically deleted upon termination of your web browser. We also transmit permanent cookies to your web browser with a validity period of at most 365 days. We are exclusively using these cookies in order to respect your settings for the type of presentation (normal, inverted) and for the font size. Furthermore, it will be recorded whether you've taken notice of the information about the usage of cookies in your web browser. Please note that you can adjust your web browser such that you will be informed on setting cookies and allow cookies on an individual basis resp. exclude the acceptance of cookies for specific cases or generally. You also can adjust the automatic deletion of cookies upon termination of your web browser. Upon deactivation of cookies the functionality of our web site can be limited. In any case, our information offering is available to its full extent.

Access data

The legitimate interests pursued by the European Commission include, among others, also the adaptation and optimisation of the information offering and the investigation, detection and prosecution of illegal activities in connection with the usage of our web site. The ELRC website uses Matomo Analytics, an Internet analytics service. Matomo Analytics will use this information as it is determined by the site manager to analyse how you use this site and to implement services associated with website.

Submission of data to the ELRC-SHARE Repository

The ELRC-SHARE Repository is used for documenting, storing, browsing and accessing Language Resources that are provided to and through the ELRC. When you are visiting our web site (www.lrc-coordination.eu) no data are transmitted to the ELRC-SHARE Repository(<https://elrc-share.eu>). From time to time the ELRC-SHARE Service Providers (ELRC consortium partner ILSP/Athena R.C.) may use electronic forms on this site to gather personal information for purposes directly related to a service, function or activity of the ELRC-SHARE services. When the Service Provider will do so it will let users know the purpose for which the information is being collected (including if the information is to be

published). The personal data requested through such forms are: name, email, and affiliation. Completion of and submission of any form on this website is entirely at the discretion of the user. The data will not be transmitted to any third parties or otherwise disclosed, except on the basis of concrete legal obligations or contractual obligations within the ELRC (SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16)). The personal data gathered are stored in the Service Provider's secure servers. It is possible that in the future the ELRC-SHARE infrastructure, including its registered users' database, will be migrated to the EC cloud infrastructure on the basis of contractual obligations within the ELRC.

The ELRC-SHARE website and services log certain information about every request sent to them. This information is used for system administration and for producing usage statistics. Summary statistics are extracted from this data and some of these may be made publicly available, but these do not include information from which individuals could be identified. Relevant subsets of this data may be used as part of investigations of computer misuse involving this site. Data may also on occasion be used to enable investigation of technical problems on the website. Otherwise logged information is not passed to any third party except if required by law.

Submission of Data Sources to the Data Sources Catalogue

The ELRC Data Sources Catalogue (http://cef-at-sources.elda.org/add_source/) is used for identifying and collecting websites' URLs that could be exploited, through a crawling process, for the preparation of Language Resources within ELRC, in particular parallel corpora to be built up from multilingual websites. There is no data transfer between the ELRC website and the ELRC Data Sources Catalogue. The data collected via the Data Sources Catalogue are exported to a relational database which is accessible for the ELRC consortium and disclosed – on demand – to the European Commission. By submitting a source via the online form, the User signifies his consent to the processing.

Data within ELRC Events and other Services

The data collected within the management and implementation of the ELRC events and activities (e.g. as part of the registration to ELRC workshops or conferences, as part of on-site assistance requests and/or as part of the use of the ELRC Helpdesk) is processed and stored solely for and within the concrete legal and/or contractual obligations of the ELRC and the ELRC consortium partners within SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16). In the frame of ELRC events, we collect data for registration purposes. Specifically, we ask to provide participants name, email address, organisational affiliation and position in the organisation. The personal information that we collect from you is processed and stored on a secure server in accordance with applicable law. For the purpose of workshop preparation, the data can be extracted as excel file or as delimited text. The different ELRC events (e.g. workshops, conferences, ELRC Experience Cafés) may be photographed and/or filmed. Participants are informed about this with their registration to the event. Film and photo materials may be used for dissemination purposes on the ELRC website and on social media within the boundaries of the ELRC.

Data is also being collected as part of the ELRC Technical and Legal Helpdesk (<http://www.lr-coordination.eu/helpdesk>). The corresponding webform (<http://helpdesk.lrcooperation.eu/tickets/submit/>) asks users to submit their name and email address as well as a description of their question. All data obtained as part of the Helpdesk is being used for the purpose of providing this service. Specifically, the data collected via the ELRC Helpdesk are exported to a

file which is shared among the ELRC consortium and disclosed – on demand – to the European Commission. By submitting a request via the online form or directly to an e-mail address, the User signifies his consent to the processing.

Use of Social Media

When you are visiting our web site no data are transmitted to social media services. Profiling by any third parties hence is precluded. You though have the option to change over to our information offerings on Facebook, Twitter, LinkedIn and YouTube. For the usage of these services we refer to the data protection policies of the respective service providers. We are processing your personal data within the social networks insofar as you post contributions, send messages or otherwise communicate with us.

Correspondence

You have the option to contact us by e-mail. We will use your e-mail address and other personal contact data for the correspondence with you. Due to legal obligation every e-mail correspondence will be archived. Subject to our legitimate interests your e-mail address and other personal contact data can be stored in our contact data base. In this case you will receive a corresponding information on the processing of your contact data.

Access and Intervention

Besides the information in this data protection policy you have the right of access to your personal data. To ensure fair data processing, you have the following rights:

- The right to rectification and completion of your personal data
- The right to erasure of your personal data
- The right to restriction of the processing of your personal data
- The right to object to the processing of your personal data on grounds related to your particular situation

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller.

European Commission, *Directorate General for Communications Networks, Content and Technology (DG CONNECT), Directorate G Data, Unit G.3 Accessibility, Multilingualism & Safer Internet, Head of Unit at CNECT-G3@ec.europa.eu.*

- The Data Protection Officer (DPO) of the Commission

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

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (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 by the Data Controller.

Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority if you consider that the processing of your personal data infringes statutory data protection regulations

Privacy Statement: ELRC Events

1. Introduction

The European 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 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle, and ensure the protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of both the Data Controller in charge with whom you may exercise your rights and the Data Protection Officer.

The information in relation to the processing operation for events organised by the European Commission is presented below.

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

Purpose:

The European Commission collects and uses your personal information to ensure an adequate organisation, follow-up, communication, and promotion of events organised by the European Commission. This includes conferences, country workshops, meetings of the Language Resource Board (LRB) and technology workshops.

The purposes of the processing of personal data include the management of lists and mailing lists for contacts, invitations, participants, reports, minutes, distribution of reports/minutes, feedback on reports, meeting follow-up, follow-up meetings, follow-up actions, photographs/pictures, presentations, live web streaming and/or audio and video recording of speakers and participants, news and publications.

We contact you either on the basis of your specific request to be invited to one of our events, of previous contacts you had with ELRC or other services of the European Commission or – in some cases – your names and email addresses were collected from publicly accessible sources on the Internet.

Your personal data will not be used for any automated decision-making service including profiling.

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

We process your personal data, because it 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 (Article 5(1)(a) of Regulation 2018/1725). In addition, the processing of personal data as undertaken by the European Commission is grounded on the following legal bases:

- Directive 2003/98/EC of the European Parliament and of the Council of 17 November 2003 on the re-use of public sector information (as amended by Directive 2013/37/EU), esp. Article 9

- Commission Decision 2011/833/EU on the reuse of Commission documents Decision 2009/496/EC, Euratom of the European Parliament, the Council, the Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee and the Committee of the Regions of 26 June 2009 on the organisation and operation of the Publications Office of the European Union.

The processing operations on personal data linked to the organisation, management, follow-up and promotion of the events are necessary for the management and functioning of the ELRC.

Your consent is required for the following actions during the meeting or event (if applicable):

- the processing of your personal data for inviting you to future events the data controller may organise;

If you opt-in, you are giving us your explicit consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to process your personal data for those specific purposes. You can give your consent via a clear affirmative act by ticking the box(es) on the online registration form.

Your consent for these services can be withdrawn at any time and detailed information on how to withdraw consent will be contained in the privacy statement linked to the specific meeting or event.

We may process special categories of personal data indicated in Section 4, because the data subject has given explicit consent to the processing of those personal data for one or more specified purposes (Article 10(2)(a)). The data subjects may for example indicate their dietary requirements in a non-mandatory field of the registration form, so as to accommodate their needs.

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

In order to carry out this processing operation, the European Commission collects the following categories of personal data:

Identity personal data:

- Data necessary for the organisation and management of the meeting, such as gender (needed for the right title)/name/surname, organisation type/place of work/job title, company URL, postal and/or e-mail addresses, phone number, LinkedIn/Twitter and/or Facebook account

Other personal data:

- Pictures, presentations, audio and video recording of speakers and participants

Video recording and images of the speakers and the participants, as well as photographs of groups of participants and organisers could be taken and published in the context of the meeting and in the framework of the ELRC activities on the intranet and internet, including social media. If you do not agree with this publication of your personal data, please inform the data controller.

The provision of personal data (title, full name, represented organisation, position, country as well as email address) is mandatory to attend the **ELRC events**. If you do not provide your personal data, you will not be able to attend.

The web service available for the online registration uses cookies in order to ensure communication between the client and the server. You can deactivate cookies at any time by configuring your web browser. For more information on the use of cookies you can consult for details, see AllAboutCookies.org

5. How long do we keep your personal data?

The European Commission only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for the organisation and management of the events (conferences, workshops and meetings) and follow-up actions. All non-sensitive personal data will be deleted from databases 5 years after the last action in relation to the event.

6. How do we protect and safeguard your personal data?

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the ELRC consortium or the European Commission, the operations of which abide by the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 concerning the security of information systems used by the European Commission.

ELRC, being one of the Commission's contractors, is bound by the contracts SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16) for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)¹.

In order to protect your 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. To ensure that the data is being protected and to minimise the risk of data loss, the servers of the ELRC consortium partners are updated on a regular basis and back-ups are created regularly. In addition, security software to detect malicious software is activated. 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 operation. In the case of ELRC, the data can only be accessed by the ELRC consortium members and the European Commission as described below. In addition, each partner institution has a designated Data Protection Officer who is responsible for data security issues according to the GDPR and national data security rules. He/she is responsible for the security of personal data and that the organisation adheres strictly data security rules and its own guidelines.

¹ Regulation (EU) 2016/679, OJ L 119, 4.5.2016, p. 1

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

Access to your personal data is provided to the ELRC consortium and to the Commission staff responsible for carrying out this processing operation and to authorised staff (e.g. members of the Language Resource Board or external event organisers acting on their behalf) according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Authorised staff of the European Commission, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Union legislation.

Your personal data will be part of a list of contact details shared internally amongst the ELRC consortium for the purpose of contacting data subjects in the future in the context of the project’s activities. If you do not agree with this, please contact the Controller by using the Contact Information below and by explicitly specifying your request.

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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 “Contact Information” below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller.

European Commission, *Directorate General for Communications Networks, Content and Technology (DG CONNECT), Directorate G Data, Unit G.3 Accessibility, Multilingualism & Safer Internet, Head of Unit at CNECT-G3@ec.europa.eu.*

- The Data Protection Officer (DPO) of the Commission

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

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor 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 by the Data Controller.

10. Where to find more detailed information?

The European Commission's Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-01063.1.

Privacy Statement: Targeted Consultations

1. Introduction

The European Commission is committed to protect your personal data and to respect your privacy. The European Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, 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 Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

This privacy statement concerns the processing operation 'Targeted consultation activities', undertaken by the ELRC Consortium as described below.

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

The European Commission collects and uses your personal information within the framework of targeted consultation activities, including surveys about requirements, use, availability and readiness of Artificial Intelligence solutions, language technologies and language resources, language data management practices, language policies, and/or feedback forms related to ELRC events and activities.

More specifically, this concerns the following processing activities:

- to obtain the views of the respondents of the targeted consultation activity. In view of the design, evaluation and revision of initiatives, it is indispensable for the European Commission to receive input and views from those who are considered to be concerned by the policy or initiative.
- to obtain the views of stakeholders to explore a subject for which very limited information is available. This exploratory targeted consultations activity (hereafter, 'targeted consultation') will provide further information to the European Commission, which are necessary to take basic conceptual decisions.

Your views will be published anonymously either directly as received, in the form of a summary report, or included in a wider policy document. Your identity is only published together with your contribution if you consent to the publication of your identity.

Similarly, audio- or video recordings are only published based on your explicit consent.

The subject matter of the consultation activity requires you to provide personal data in your response. These personal data will only be published subject to your explicit consent.

It is your responsibility if you opt for confidentiality of your personal data to avoid any reference in your submission or contribution that would reveal your identity.

To avoid misuse, anonymous contributions to the consultation activity may not be accepted.

The consultation activity may use the Commission's online questionnaire tool EUSurvey which may in some cases require login via EULogin which requires certain personal data such as name, surname and e-mail address of the registrant. For further information on EULogin, please refer to the dedicated processing operation 'DPO-839-4 Identity & Access Management Service (IAMS)'. During physical events, you may also be asked to provide your feedback by completing consultation papers handed out during the specific conference, meeting or workshop. Your feedback will be kept anonymously and may be stored in both original and digital form. The consultation activity may also take the form of a videoconference using a web conferencing application. This application may contain a feature that allows to record the video call and to store it on the (co-)host's computer or cloud. Participants will be notified when the recording started and are free to leave the video call in case they do not agree to being recorded.

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 Auditor.

Your personal data will not be used for an automated decision-making including profiling.

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

We process your personal data, because:

- (a) processing is necessary for the performance of a task carried out in the public interest;
- (b) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) it is based on your consent, for one or more specified purposes:
 - Publication of the identity of the stakeholder or respondent;
 - Publication of audio or video recordings;
 - If the subject matter of a targeted consultation requires respondents to provide personal data in their response, their publication;
 - if applicable, the processing of special categories of personal data.

The Union law which is the basis for the processing based on Articles 5(1)(a) and (b) of Regulation (EU) 2018/1725 is the Treaty of the European Union, and more specifically its Articles 1 and 11, Article 298 of the Treaty on the Functioning of the European Union, read in conjunction with Recital 22 of Regulation (EU) 2018/1725), as well as the Protocol 2 on the application of the principles of subsidiarity and proportionality. In addition, the processing of personal data as undertaken by the European Commission is grounded on the following legal bases:

- Directive 2003/98/EC of the European Parliament and of the Council of 17 November 2003 on the re-use of public sector information (as amended by Directive 2013/37/EU), esp. Article 9
- Commission Decision 2011/833/EU on the reuse of Commission documents Decision 2009/496/EC, Euratom of the European Parliament, the Council, the Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee and the

Committee of the Regions of 26 June 2009 on the organisation and operation of the Publications Office of the European Union.

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

In order to carry out this processing operation the European Commission may ask you to provide the following categories of personal data:

- name and surname,
- profession,
- country of residence,
- e-mail address of the respondent,
- the name, size, type and transparency number of the organisation on whose behalf the respondent is contributing,
- personal data related to the physical, economic, cultural, or social identity of the respondent, insofar as they are not falling under Article 10 of the Regulation,
- personal data included in the response or contribution to the targeted consultation (if the targeted consultation at hand requires so).

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply to the targeted consultation.

5. How long do we keep your personal data?

The European Commission only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for a maximum of five years after the closure of the file to which the present targeted consultation belongs. A file is closed at the latest once there has been a final outcome in relation to the initiative to which the targeted consultation contributed. This retention period is without prejudice to an earlier elimination of personal data not part of the file or cases of administrative elimination.

This administrative retention period of five years is based on the retention policy of European Commission documents and files (and the personal data contained in them), governed by the common Commission-level retention list for European Commission files [SEC\(2019\)900](#). It is a regulatory document in the form of a retention schedule that establishes the retention periods for different types of European Commission files. That list has been notified to the European Data Protection Supervisor.

The administrative retention period is the period during which the European Commission departments are required to keep a file depending on its usefulness for administrative purposes and the relevant statutory and legal obligations. This period begins to run from the time when the file is closed.

In accordance with the common Commission-level retention list, after the 'administrative retention period', files including (the outcome of) targeted consultations (and the personal data contained in them) can be transferred to the Historical Archives of the European Commission for historical purposes (for the processing operations concerning the Historical Archives, please see notifications [DPO-1530.4 ARES-NOMCOM](#). [ARES \(Advanced Records System\)](#) et [NOMCOM \(Nomenclature Commune\)](#), [DPO-3871-3 Notification for the digital archival repository and ARCHISscanning](#) and ['DPO-2806-5 Gestion des dossiers papier structurés par nom de personnes et transférés aux Archives Historiques'](#)).

6. How do we protect and safeguard your personal data?

All personal data in electronic format (emails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the ELRC and/or 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 your 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. To ensure that the data is being protected and to minimise the risk of data loss, the servers of the ELRC consortium partners are updated on a regular basis and back-ups are created regularly. In addition, security software to detect malicious software is activated. 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 operation. In the case of ELRC, the data can only be accessed by the ELRC consortium members and the European Commission as described below. In addition, each partner institution has a designated Data Protection Officer who is responsible for data security issues according to the GDPR and national data security rules. He/she is responsible for the security of personal data and that the organisation adheres strictly data security rules and its own guidelines.

The ELRC consortium is bound by the contracts SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16) for any processing operations of your personal data on behalf of the Commission. The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

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

Access to your personal data is provided to the ELRC and the Commission staff responsible for carrying out this *processing operation* and to authorised staff according to the “need to know” principle, in particular to follow-up on the targeted consultation. Such staff abide by statutory, and when required, additional confidentiality agreements.

Certain personal data may be made public on the Europa website and/or the ELRC websites (lr-coordination.eu, elrc-share.eu, helpdesk.lr-coordination.eu), namely:

- any personal data on which you consented to their publication;
- personal data spontaneously provided by you in your contribution (without it being required by the *consultation activity*.)

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

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.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

Insofar you have consented to the certain processing of your personal data to the Data Controller for the present processing operation, you can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

9. Contact information

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller.

European Commission, *Directorate General for Communications Networks, Content and Technology (DG CONNECT), Directorate G Data, Unit G.3 Accessibility, Multilingualism & Safer Internet, Head of Unit at CNECT-G3@ec.europa.eu.*

- The Data Protection Officer (DPO) of the Commission

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

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (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 by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-01011.

Privacy Statement: Management of subscriptions to receive information

1. Introduction

The European 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 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, 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 Data Controller with whom you may exercise your rights and the Data Protection Officer.

Please find information about how ELRC manages and processes subscriptions to receive information below.

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

Purpose:

The processing of personal data serves the purpose of:

- authenticating and authorising access to the ELRC-SHARE repository services: uploading and downloading (in accordance with the relevant licensing terms granted for each resource) of language resources and metadata thereof; archiving (storage and maintenance for preservation purposes) of language resources; documentation (with metadata) of language resources. Users who require access to these services register through an online form. The personal data provided at the registration procedure (i.e. name, organisation, email, country, password) are only processed for legitimate purposes. The European Commission may use them to contact the registered user regarding the resources the user has uploaded, ELRC events and other ELRC-related information and for statistical purposes.
- establishing and managing lists of natural persons who subscribe to receive information from the European Commission. Based on their request, those subscribers receive information on important developments, activities, events, initiatives or thematic issues, in particular through articles, reports, interviews, newsletters as well as visual content.

You can also contact the ELRC via email (via help@cefat-tools-services.eu, help@lr-coordination.eu or elrc-share@ilsp.gr), phone, skype or via the helpdesk web forum either to request information, to register for the eTranslation set of tools (<https://ec.europa.eu/cefdigital/wiki/display/CEFDIGITAL/eTranslation>) or request technical help about the ELRC-SHARE repository. When you get in touch with us via email, your personal data is only collected in order to reply and process your request. Your message will be forwarded to another service if the team responsible for the mailbox is unable to answer your question. An email will inform you about which service your question has been forwarded to. Due to legal obligations, every email correspondence will be archived. Subject to our legitimate interests, your email address and other personal contact data can be stored in our contact data base. In this case, you will receive a

corresponding information on the processing of your contact data. Data is also being collected as part of the ELRC Technical and Legal Helpdesk (<http://www.lr-coordination.eu/helpdesk>). The corresponding webform (<http://helpdesk.lr-coordination.eu/tickets/submit/>) asks users to submit their name and email address as well as a description of their question. All data obtained as part of the Helpdesk is being used for the purpose of providing this service. Specifically, the data collected via the ELRC Helpdesk are exported to a file which is shared among the ELRC consortium and disclosed – on demand – to the European Commission. By submitting a request via the online form or directly to an email address, the User signifies his consent to the processing.

You can also contact ELRC-SHARE in accordance with the ELRC-SHARE “Notice and Take Down Policy”. The personal data (name, email, organisation, telephone number) provided to us at the notice and take and down procedure are only processed to communicate with you and for statistical purposes. After the dispute has been resolved, we delete them unless otherwise requested by the law.

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

We process your personal data, because it 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 (Article 5(1)(a) of Regulation 2018/1725). 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 addition, the processing of personal data as undertaken by the European Commission is grounded on the following legal bases:

- Directive 2003/98/EC of the European Parliament and of the Council of 17 November 2003 on the re-use of public sector information (as amended by Directive 2013/37/EU), esp. Article 9
- Commission Decision 2011/833/EU on the reuse of Commission documents Decision 2009/496/EC, Euratom of the European Parliament, the Council, the Commission, the Court of Justice, the Court of Auditors, the European Economic and Social Committee and the Committee of the Regions of 26 June 2009 on the organisation and operation of the Publications Office of the European Union.

The processing operations on personal data linked to the management of subscriptions to receive information are necessary for the provision of information. All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the ELRC or the European Commission.

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

Identity personal data:

- Data necessary to ensure the delivery of the service to the subscriber, including first name, last name, organisation and email address.

The provision of personal data is mandatory in order to register for the ELRC-SHARE repository, to subscribe for the ELRC Newsletter and/or to handle requests via email/phone/social media and/or Skype.

In addition, the web service available for the newsletter subscription as well as the ELRC websites make use of cookies in order to ensure communication between the client and the server. You can deactivate cookies at any time by configuring your web browser. For more information on the use of cookies you can consult for details, see AllAboutCookies.org

5. How long do we keep your personal data?

The European Commission only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. The personal data will be processed until a data subject withdraws his/her consent for processing (i.e. unsubscribes from receiving information or cancels the registration). Subscribers can either:

- write to the functional mailbox specified in the specific privacy statement to ask to be unsubscribed from the mailing list or to be deleted from the ELRC-SHARE registered users database; or
- follow the unsubscribe link or instructions provided in any email or by requesting it in a separate e-mail to the indicated e-mail address.

Appropriate action is taken by the European Commission within a week of receiving the unsubscribe request. In cases where data is kept for statistical purposes, some subscriber's optional data may be kept for 5 years after the unsubscription, providing these do not allow to identify the subscriber anymore and that these are available to a very restricted number of authorised persons performing the processing operation on a need to know basis, for the sole purposes of generating anonymised statistics.

If you have any questions about the processing of your email and related personal data, do not hesitate to include them in your message.

6. How do we protect and safeguard your personal data?

All data in electronic format (e-mails, documents, uploaded batches of data, etc.) are stored either on the servers of the ELRC consortium or the European Commission, the operations of which abide by the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 concerning the security of information systems used by the European Commission.

ELRC, being one of the Commission's contractors, is bound by the contracts SMART 2019/1083 (contract no. LC-01325001), SMART 2016/0103 LOT 1 and LOT 2 (contract no. LC-00564992 and LC-00564561) and SMART 2015/1091, (contract no. 30-CE-0816330/00-16) any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)².

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security,

² Regulation (EU) 2016/679, OJ L 119, 4.5.2016, p. 1

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. To ensure that the data is being protected and to minimise the risk of data loss, the servers of the ELRC consortium partners are updated on a regular basis and back-ups are created regularly. In addition, security software to detect malicious software is activated. 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 operation. In the case of ELRC, the data can only be accessed by the ELRC consortium members and the European Commission as described below. In addition, each partner institution has a designated Data Protection Officer who is responsible for data security issues according to the GDPR and national data security rules. He/she is responsible for the security of personal data and that the organisation adheres strictly data security rules and its own guidelines.

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

Access to your personal data is provided to the ELRC consortium and to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Authorised staff of the European Commission, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Union legislation.

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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller.

European Commission, *Directorate General for Communications Networks, Content and Technology (DG CONNECT), Directorate G Data, Unit G.3 Accessibility, Multilingualism & Safer Internet, Head of Unit at CNECT-G3@ec.europa.eu.*

- **The Data Protection Officer (DPO) of the Commission**

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10. Where to find more detailed information?

The European Commission's Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-03928.1.