



Privacy Notice

Introduction

Please read this Privacy Notice carefully, it describes why and how your data is collected and used for research purposes in the framework of the **'Study facilitating free movement through further digitalisation in social security coordination.'** It outlines 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.

Data Protection roles

European Commission, Directorate-General Employment, Social Affairs and Inclusion (DG EMPL), Unit E2. Social Security Coordination is the Data Controller with overall control over the purposes and means of processing personal data collected in respect of the above study.

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).

Ecorys Europe EEIG and consortium partners are Data Processors acting on DG EMPL's instructions to process the data for the study, which runs between September 2024 and September 2025.

What the research is about

Ecorys is conducting consultation activities at EU and national level as part of the **'Study facilitating free movement through further digitalisation in social security coordination'**, which was commissioned by DG EMPL of the European Commission. The study will cover all 27 Member States and aims to:

- Deliver findings related to ongoing ESPASS pilot activities, including the identification of relevant problems and obstacles, potential synergies between ESSPASS and EESSI, the costs and benefits of and potential for the (large-scale) deployment of an ESPASS solution across the EU; and
- Identify and assess remaining problems not addressed by EESSI and ESSPASS across sectors and opportunities for synergies with other digital solutions developed at EU level.

Why are you being contacted

You are being contacted by Ecorys since it has been concluded that your views are relevant and necessary to achieve the specific purpose of the consultation activity in the public interest as described above. Your participation in the consultation activity is completely voluntary.

The nature of the personal data we will be using and its purpose

The categories of your personal data that may be used for this project are:

- Your **professional or personal contact data**: names, email addresses and phone numbers which will be used to contact you to invite you to participate in the consultation activities
- In the context of the targeted consultation activities such as online focus groups, meetings, or stakeholder interviews, you may be recorded (audio / video). This is necessary for note taking only. Any interview recordings are done with informed consent only.
 - Your interview / survey responses, where these contain information that may be able to identify you as a respondent (e.g., by discussing your role or job title in a particular organisation). Furthermore, you may spontaneously provide other, non-requested



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

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- The consultation activity uses the Commission's online questionnaire tool EUSurvey that may require you to login via your 'EU Login' or 'social media account'. 'EU Login' requires certain personal data such as the name, surname and e-mail address. For further information, please refer to the privacy statements of 'EU Login' and 'EU Survey.' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: [DPR-EC-03187](#)) and 'EUSurvey' (reference number: [DPR-EC-01488](#)). Should you choose to log in through your social media account, please refer to the pertinent social media platform's privacy statement.

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; and

(b) processing is necessary for compliance with a legal obligation to which the controller is subject.

The Union law which is the basis for the processing based on Article 5(1)(a) 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.

How long do we keep your personal data?

The Data Controller 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 consultation activities belong. A file is closed at the latest once there has been a final outcome in relation to the initiative to which the consultation activities contributed.

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](#).

How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the Commission or of its processor (Ecorys). 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 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. 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.

The Commission's processor (Ecorys) is bound by a specific contractual clause 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.

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

A limited number of researchers at Ecorys and its partners will be able to access data about you from information you share. Your views will, in principle, be published on a Europa website, in the form of a summary report. Any published findings will not identify or be attributed to specific organisations or individuals unless specific consent to the publication is sought.



On completion of the study, your contribution to the consultation activities will be stored in the Commission's document management system (for further information on the Commission's document management system please refer to the processing operation 'Management and (short- and medium-term) preservation of Commission documents', reference number: DPR-EC-00536). 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.

Access to your personal data is provided to 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 consultation activities. Such staff abide by statutory, and when required, additional confidentiality agreements.

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.

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.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

Contact information

The Data Controller

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 Employment, Social Affairs and Inclusion, Unit E2. Social Security Coordination at EMPL-E2-UNIT@ec.europa.eu.

For any such communication please indicate **DPR-EC-01011** in the subject matter.

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.

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*.