EUROPEAN COMMISSION

# PROTECTION OF YOUR PERSONAL DATA

**This privacy statement provides information about the processing and the protection of your personal data.**

**Processing operation:** Knowledge for Policy (K4P) communities

**Data Controller:** European Commission, Joint Research Centre (JRC), Science for Democracy, Public Governance and Administration Unit, JRC.S.2

**Record reference:** DPR-EC-09147

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## 1. Introduction

The European Commission (hereafter 'the 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, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "*Knowledge for Policy (K4P) communities*" undertaken by the European Commission's Joint Research Centre, JRC.S.2 is presented below.

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

The Knowledge for Policy (K4P) platform is the EU Commission's platform for evidence-based policymaking, managed by the Commission's JRC. Personal data are processed to provide specific services, namely (i) K4P member validation / Content submission and review; (ii) interaction with members of the community; and (iii) delivery of Newsletter services.

**Purpose: K4P member validation / Content submission and review**

The purpose is user management, including authentication. The delivery of this service requires user authentication to allow identifications of the parties involved (the contributor, that submits content, and the online community moderator, who reviews it). K4P implements authentication via EU Login, and, as such, processes personal information according to DPR-EC-03187 - EU Login.

Once logged in, users can apply to become validated K4P members by updating and submitting their personal profile, which will be evaluated and reviewed by the K4P Online Community Manager (OCM – only JRC staff) of the concerned knowledge service. OCMs will process the personal information provided in the user's profile to accept or decline the user as K4P contributors. If their application is successful, their personal profile is made available on the K4P website. Validated K4P members (i.e. users with an approved user account and member of at least one knowledge service community) can submit knowledge to K4P and comment on knowledge that is subject to commentary, contact privately other members, apply to join working groups, and follow certain conversations. Users can edit and delete their profile, and any subsequently submitted content, at any time. Guidance to users on how to fill in their profiles is provided. All data provided by data subjects is checked by trained K4P OCMs before being published or rejected.

**Purpose: Interaction with members of the community**

The purpose of processing is to allow users to interact within the platform with other users. External users must login in using EU Login and submit a Personal Profile as a precondition to engage in community activities; to that end, K4P members disclose personal and professional information. Their username, first and last name, and email address are taken from their EU Login account and used in their Public Profile. This information is at first viewed only by a K4P Online Community Manager (OCM – a JRC staff person), who checks it. If it meets K4P's criteria, some of this information is published on the site, and the user becomes a Validated Member, unlocking limited editorial permissions.

**Purpose: Delivery of Newsletter services**

The purpose is to allow for a delivery of a K4P newsletter based on the EC Newsroom corporate

service. K4P newsletters are provided by the EC's Newsroom corporate service. Users subscribe to newsletters by interacting with the Newsroom corporate service directly - no JRC system collects subscriber information to provide this service, and K4P does not save a history of subscriptions or cancellations. Note that K4P Editors can access and export the list of their subscriber records from the Newsroom, including at a minimum their email address, as well as any optional information the subscriber provided (first name, last name, country of residence, sector of activity). This data is used to optimize the newsletter, and will not be used for any automated decision-making, including profiling.

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

We process your personal data, because, according to Article 5(1)(a) of Regulation (EU) 2018/1725, 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 basis for the processing has been laid down in the following Union law:

- Article 8 of the Euratom Treaty, establishing a Joint Nuclear Research Centre;
- Commission Decision of 10 April 1996 (96/282/Euratom) on the reorganization of the Joint Research Centre;
- Horizon Europe Programme (Regulation (EU) 2021/695; Council Decision (EU) 2021/764; JRC Work programme for 2025, 2026 and 2027 - Portfolio 25 (Foresight and innovative policymaking));
- Article 11 of the Treaty of the European Union ('*The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action'; 'The European Commission shall carry out broad consultations with the parties concerned in order to ensure that the Union's actions are coherent and transparent.'*);
- Article 298(1) of the Treaty on the Functioning of the European Union ('*In carrying out their missions, the institutions, bodies, offices and agencies of the Union shall have the support of an open, efficient and independent European administration*.').

The Commission officially endorsed the concept of Knowledge Centres (KCs) and Competence Centres (CCs) in its Communication on "Data, Information and Knowledge Management" (C(2016) 6626)). These Centres bring together experts and knowledge from different locations inside and outside of the Commission, creating a new instrument to develop and pursue informed and evidence-based EU policies. The development of KCs and CCs was one of the key elements of the JRC 2030 strategy. In such context, the JRC manages the Knowledge for Policy (K4P), which aims to bridge the science-policy gap by making available data and information from experts to decision makers across Europe. K4P offers advanced capabilities for knowledge management, synthesis, and community management. The K4P platform serves as a dedicated focal point for the collection, verification, structuring and dissemination of expertise in priority policy areas. Knowledge sharing is essential for the implementation of research-related framework programmes managed by the JRC and the EC.

We do not process special categories of personal data as per Article 10 and 11 of Regulation (EU) 2018/1725. All data provided by data subjects is checked by trained K4P Online Community Manager (OCM) before being published and made available on the K4P platform.

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

In order to carry out this processing operation JRC.S.2 collects the following categories of personal data:

- **Users' personal profiles:** these are submitted as part of the user's application to become a member of the K4P community, and are composed of:
    - data provided from the user's EU Login account: first name, last name, email address;
    - other information voluntarily provided by the user to help the Online Community Manager assess their application: links to personal website & social network profiles, name of employer/organisation, position and/or job title/function within an organization, short biography, description of current or previous work, photo/avatar. The following two fields are mandatory: "At a Glance", and the "knowledge service" to whom the user is applying.
- **Knowledge that the data subject contributes to K4P:** comments, blog posts, publications, news items, etc.
- **Usage and device information:**
    - for each user: Security data/log files, which include Internet Protocol (IP) address;
    - for K4P members: K4P login and browsing history, e.g. date and time of, most recent successful and unsuccessful authentication, Last change of password, Last password reset, Number of good logins and failed attempts. Account status (whether active, inactive or logged by administrator.) Recent passwords – to assure security policy regarding password re-use.

The provision of some personal data is mandatory to meet functional or non-functional requirements related to content submission or participation in community activities. You need to authenticate via EULogin to be able to submit content for publication on the K4P platform and if your profile is not validated, you will not be able to engage with the K4P community.

Users' username, first and last name, and email address, are taken from their EU Login account and used in their Public Profile. For more information on the related processing of personal data see record DPR-EC-03187.

All other data on K4P is provided by the data subjects/users, directly or via visualisation platforms (e.g. Maps & Charts, Microsoft's PowerBI, Tableau, QLIK, and ArcGIS) or EC tools (e.g. PUBSY, JRC Data Catalogue. For more information on the related processing of personal data see the respective records: DPR-EC-01858 - JRC Data Catalogue, and DPR-EC-00234 - PUBSY (JRC Outputs Management System and Related Websites)).

Please note that the related knowledge content on K4P is under the responsibility of the publishers: when submitting/publishing content containing personal data, validated members must ensure to comply with the applicable data protection obligations. For additional information on Validated K4P Members' contribution, please refer to the K4P Terms and Conditions.

More information on the processing of personal data for websites managed by the European Commission (e.g. cookies, IP address and device ID) is available in the Record DPR-EC-00083 – Processing of personal data on European Commission websites within the europa.eu domain, and at the following link: https://commission.europa.eu/privacy-policy-websites-managed-european-commission_en

## 5. How long do we keep your personal data?

JRC.S.2 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- **Users' Personal Profiles:** Registered users to the K4P e-services have password protected access to their profile and can, at any moment, update their information, unsubscribe from specific interest groups or communications, or delete their content and profile

entirely. Moreover, public profiles will be archived after 10 years of inactivity (account owners will be warned beforehand). Note: their published knowledge will remain online, but their authorship will be deleted.

- **Submitted Knowledge:** Submitted knowledge can be edited or deleted by the user at any time. It will be displayed on the K4P platform as long as needed for evidence-based policymaking.
- **Security data/Log files:** these files are stored for 6 months. In context of investigations of security incidents the data could be further processed following record DPR-EC-02886 "DIGIT IT Security operations and services", where a different retention period applies.

Time limits of the retention of data in the EU Login Authentication Service are defined in the privacy statement of the European Commission's Identity & Access Management Service (DPR-EC-03187).

## 6. 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 either on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

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.

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

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. Such staff abide by statutory, and when required, additional confidentiality agreements.

In particular, the information published on K4P can be accessed by any person in the world using the Internet or subscribing to Internet notification services.

Users can apply to become Validated Members by submitting their Personal Profile. If their application is successful, their Personal Profile is published in the global K4P members' gallery and in the selected knowledge service's members' gallery, and they can then submit knowledge/content to K4P.

Finally, only trained JRC staff have the role of Online Community Managers (OCMs), who examine the knowledge submitted by Validated Members, and either publish or reject it.

For the list of email addresses of newsletters' subscribers: The Knowledge4Policy Newsroom administrators and the newsletters' publishers (knowledge centres, competence centres and other JRC knowledge services) have access to the list of subscribers to their specific newsletters. This includes Commission staff responsible for carrying out this processing operation and authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

In case of a security incident, all data categories may be shared with the JRC LISO (JRC Local Information Security Officer) DIGIT.S (DIGIT IT Security) and HR.DS (HR Directorate Security).

## 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. Where applicable, 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) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

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

- **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, JRC.S.2, at EC-KNOWLEDGE4POLICY@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-09147