



PROTECTION OF YOUR PERSONAL DATA

Processing operation: Surveys and consultations to collect interest in participation from cities and collect feedback from participants among others.

Data Controller: European Commission, CNECT A5 Artificial Intelligence for Societal Good (hereinafter “CNECT A.5”)

Data Processors and Sub-processors: a consortium led by Deloitte Consulting & Advisory BV/SR, and also including:

- Deloitte Technology, S.A., Avenida Eng. Duarte Pacheco, 7, 1070-100 Lisboa, Portugal
- Capgemini Nederland B.V., Reykjavikplein 1, 3543 KA, Utrecht, The Netherlands
- Intellera Consulting S.P.A., Via Gaetano de Castillia, 23, 20124 Milan, Italy
- Serendipity Holding BV, High Tech Campus 5 P094, Eindhoven, The Netherlands
- Agentschap Digitaal Vlaanderen, Havenlaan 88 (Bus 30), 1000 Brussels, Belgium
- Technopolis Consulting Group, Avenue de Tervueren 188A, 1159 Brussels, Belgium

The following sub-processor:

- Zoho Corporation B.V Beneluxlaan 4B, 3527 HT UTRECHT, The Netherlands
- Microsoft Ireland Operations, Ltd. South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland

Record reference: DPR-EC-01011

Table of Contents

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information

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

Purpose of the processing operation: CNECT A.5 has set-up an online helpdesk facility accessible through the Living-in.EU website to support the procurement of services and deployment at scale of local digital platforms and digital twins for smart cities and communities. CNECT A.5 collects

and uses your personal information within the framework of targeted consultation to obtain your views on this specific initiative. Indeed, to offer and provide cities' representatives with those services, a range of survey and consultation activities are foreseen as part of the project. CNECT A.5 collect cities' representatives' personal data for the following purposes:

- To collect interest from EU cities and communities in the initial stages or scaling phases of their digitalisation efforts interested in benefiting from the services of the project,
- To process your expression of interest and invite you to an information session before onboarding you to the helpdesk as a representative of your community.
- To consult cities that join the Helpdesk services on progress and implementation during the delivery of the service, and
- To consult participation cities on their experience and achievements as a result of the service.
- To being contacted by CNECT A.5 when it is concluded that your views are relevant and necessary to inform this specific initiative.

The contact details of the prospective respondent have not been in the possession of CNECT A.5 and have been solely collected for this targeted consultation activity through the use of EU Survey. The consultation activity uses the Commission's online questionnaire tool EUSurvey. For further information, please refer to the privacy statement of 'EU Survey' as well as the processing operation 'EUSurvey' (reference number: [DPR-EC-01488](#)). 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?

CNECT A.5 processes your personal data because **processing is necessary for the performance of a task carried out in the public interest (Article 5(1)(a)** of Regulation (EU) 2018/1725). The Union law which is the basis for this processing activity 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.

An additional underlying legal basis is the DEP Regulation (Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme and repealing decision (EU) 2015/2240), in particular its Articles 8 and 13(1).

We also process your personal data based on your **consent (Article 5(1)(d)** of Regulation (EU) 2018/1725) to being contacted by CNECT A.5 when it is concluded that your views are relevant and necessary to inform this specific initiative.

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

The following categories of personal data are collected as part of this processing operation:

- Name of the representative's city/community;
- Name and Surname of contact person;
- Organisation/department name;

- Role of the contact person;
- Email address of contact person;
- Phone number of contact person;

Please note that CNECT A.5 does not request nor expect that data subjects provide any special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data the data subject is considered to provide his/her explicit consent to the processing, in accordance with Article 10(2)(a) of Regulation 2018/1725.

5. How long do we keep your personal data?

CNECT A.5 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 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 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 record of processing ‘Management and long-term preservation of the European Commission’s Archives’, registered under reference number [DPR-EC-00837](#)).

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 on the servers of the European Commission and that of its processors. 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.

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 basis for the purposes of this processing operation.

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](#)).

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 the Local Digital Twins toolbox procurement - Advancing initial stages for the transformation of Smart Communities (Lot 2) and to authorised staff according to the "need to know" principle, in particular to follow-up on this study. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to your personal data is provided to the Commission's processors responsible for carrying out the evaluation and to authorised staff according to the "need to know" principle.

The information we collect will not be given to any third party.

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.

Microsoft Share Point is a third-party IT tool provided by Microsoft which provides cloud storage to store end-users' first name, last name, organisation, telephone numbers and email address to interact with city representatives and support the development of city roadmaps by the data processors and sub-processors.

Zoho Corporation B.V (Bigin), which provides a customer relationship management and online ticketing service to answer questions raised by cities and community contacts. Through this tool we track the progress of cities in their journey and respond to incoming emails at support@toolbx.eu and support form submissions behind a login in the helpdesk.

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.

Insofar you have consented to the certain processing of your personal data to CNECT A.5 for Local Digital Twins toolbox procurement - Advancing initial stages for the transformation of Smart Communities (Lot 2), you have the **right to withdraw your consent at any time** by notifying CNECT

A.5. 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 8 below.

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 reach out to CNECT-A5@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.