



E5 - Sanctions

Subject: PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Circumvention of EU Sanctions on Russia and Belarus: Staying a Step Ahead, Brussels, 8 June 2023

Data Controller: Directorate-General for Financial Stability, Financial Services and Capital Market Union (DG FISMA), Directorate E - Financial stability, sanctions and enforcement, Unit E5 - Sanctions

Record reference: [DPR-EC-01063](#)

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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 of the event on Circumvention of EU Sanctions on Russia and Belarus: Staying a Step Ahead, undertaken by DG FISMA Unit E5 – Sanctions, is presented below.

2. WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA?

Purpose of the processing operation

DG FISMA Unit E5 organises the event, collects and uses your personal information to facilitate your registration and participation to the seminar, including receiving notifications and information about the event, follow-up actions (e.g. receiving information after the event such as presentations, evaluation form, etc.). Your data will be collected by means of an online registration form.

Photos of the event

Photographs of the speakers and panoramic photographs of participants and organisers may be taken and published at <https://webcast.ec.europa.eu/> and <https://audiovisual.ec.europa.eu/en/>

The audience or non-speaker participants are not photographed individually or in groups. They may however appear on panoramic photographs of the whole event/audience.

3. ON WHAT LEGAL GROUND(S) DO WE PROCESS YOUR PERSONAL DATA

The processing operations on personal data, linked to the organisation, management, follow-up and promotion of the event on Circumvention of EU Sanctions on Russia and Belarus: Staying a Step Ahead (including web-streaming, photos, audio-visual recording) are necessary for the management and functioning of the Commission, as mandated by the Treaties. Those provisions are in particular, Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union.

Consequently, those processing operations are lawful under 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).

Your consent is required for:

- the sharing of the event on Circumvention of EU Sanctions on Russia and Belarus: Staying a Step Ahead participants list containing your name and affiliation with other participants for the purpose of future collaboration.
- 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 can be withdrawn at any time by contacting the controller of the event at RELEX-SANCTIONS@ec.europa.eu .

4. WHICH PERSONAL DATA DO WE COLLECT AND FURTHER PROCESS?

In order to carry out this processing operation the controllers: DG FISMA Unit E5 organise the event for the European Commission, collect the following categories of personal data:

Personal data collected and further processed for the purposes of the organisation and management of the seminar and conference may include in particular

- contact details (function, title, first name, last name, name of organisation, city, country, e-mail addresses/phone number).
- nationality, passport or identity card number and its date of issue and expiry date may be collected, so that data subjects may obtain access to the premises where the meeting/event is held.
- Financial information (such as a payment card number or bank account) may be collected for the payment of fees of the meeting/event or for possible reimbursements;
- Dietary requests (if any) or specific access requirements.

5. 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.

For each of the categories of personal data that is processed, please find below the retention details and the reference to the relevant record of processing

- personal data related to the organisation and management of the event on Circumvention of EU Sanctions on Russia and Belarus: Staying a Step Ahead (this includes the information given during the registration, before, during or after the event) will be deleted **one year** after the last action in relation to the event
- sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the event, but no later than within **1 month** after the end of the event.
- recordings from the web-streamed event will be kept for **2 years** before being deleted. More information is available in the Record of Processing DPR-EC-00306 (Web-streaming of Commission events).

- in case of audio-visual recording of the event, the recordings will be kept for **3 months** after the event before being deleted. More information is available in the Record of Processing DPR-EC-01937 (Audio-visual recording of meetings).
- personal data shared with the Directorate-General for Human Resources and Security of the European Commission for the participants to gain access to Commission buildings is kept for **6 months** after the termination of the link between the data subject and the Commission. More information is available in the Record of Processing DPR-EC-00655 (Commission Physical Access Control System (PACS)).
- personal data shared with the controller for future mailing purposes (e.g., for receiving newsletters or invitations to similar events) are processed in line with the Record of Processing [DPR-EC-03928](#).
- selected service providers for organisational purposes (such as caterers, travel agents or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process and protect it from unauthorised access, use and retention.

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. 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 in place. 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.

External contractors

The Commission's contractors are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation ('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 this processing operation and to other authorised Commission staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Cookies

Cookies are short text files stored on a user's device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

If registration for the event takes place via a Commission website. The cookies employed by the Commission on the registrant's device for that purpose will be covered by the cookie policy of the Commission, which is available here: https://ec.europa.eu/info/cookies_en.

When you visit the website(s) of our event and when you register, we will keep the browser history of your visit for a certain period of time (see https://ec.europa.eu/info/cookies_en). This information will then be deleted. The collection, aggregation and anonymising operations are performed in the data centre of the European Commission under adequate security measures.

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites on EUROPA. More information is available in the Record of Processing DPR-EC-00685 (Europa Analytics).

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the meeting/event website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission's control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

Third party IT tools, including Social Media

We use third party IT tools to inform about and promote the event through widely used communication channels, including the social media (for instance via [@EU Finance](#)). For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

In order to protect your privacy, our use of third party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or "play" on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties' specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users read the relevant privacy policies of [Twitter](#) carefully before using them. These explain each company's policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

The use of a third party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

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

You have consented to provide 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 at RELEX-SANCTIONS@ec.europa.eu. The withdrawal of your consent 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.

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 at RELEX-SANCTIONS@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-01063](#).