

(To be filled out in the EDPS' office)
REGISTER NUMBER: 1404

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 25/10/2016

CASE NUMBER: 2016-0950

INSTITUTION: EC - DG RTD

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

CONTROLLER : SMITS ROBERT-JAN
E-MAIL: Robert-Jan.Smits@ec.europa.eu

DELEGATE : N/A
E-MAIL:

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

THE EUROPEAN COMMISSION
DG RTD

3/ NAME AND DESCRIPTION OF THE PROCESSING

NAME: Independent expert management

DESCRIPTION OF THE INFORMAL PROCESS

Collection and further processing by the Controller of data provided by individuals for the establishment of a database of prospective independent experts to assist the Controller services with tasks managed by the Directorate-General for Research and Innovation (DG RTD): cf. the attached "List of programmes and initiatives".

This covers experts[1] who advise or assist in:

¹ OJ L 8, 12.01.2001.

- (a) The evaluation of proposals;
- (b) The monitoring of the implementation of actions carried out under Regulation (EU) No 1291/2013 as well as of previous Research and/or Innovation Programmes;
- (c) The implementation of Union research and innovation policy or programmes including Horizon 2020, as well as the achievement and functioning of the European Research Area;
- (d) The evaluation of Research and Innovation Programmes;
- (e) The design of the Union research and innovation policy, including the preparation of future programmes.

The processing operations performed by the Controller include collection, storage and evaluation of personal data of the experts.

Furthermore, information provided may lead an entry in the Early Detection and Exclusion System Database (EDES-Database) managed by the European Commission, in compliance with Regulation (EU, Euratom) 2015/1929[2]. Information exchanged within the EDES will be centralised in this database. The database shall contain information on economic operators that could represent a threat to the Union's financial interests, economic operators who are in one of the exclusion situations listed in Article 106 (1) of Regulation (EU, EURATOM) 2015/1929 and economic operators on which financial penalties are imposed (Article 106 (13)), in the form of cases created therein. The EDES foresees the right of the person concerned to be informed of the data stored in the database upon its request to the Commission. The information contained in the database shall be updated, where appropriate, following a request for rectification or an erasure or any modification of data. For more information, please visit:

http://ec.europa.eu/budget/explained/management/protecting/protect_en.cfm .

Attachment: 'List of Programmes and Initiatives'

This section provides an overview of the operations for the registration, selection and management of independent experts.

For more details, consult the "Detailed description of the processing" published in the Legal Notice of the Participant Portal (PP).

3.1 On-line registration

Experts can register online their profile via the European Commission Participant Portal as described in the document "Detailed description of the processing".

The data collected via this online registration are stored in the EC database of experts and transferred to the Expert Management IT system for all experts with a valid profile.

The online registration of experts is centrally managed by the Research Executive Agency (REA), acting as a Controller via the Participant Portal, and locally by each Controller.

Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation may be received only in as much as these data appear spontaneously in the CV provided by the data subjects. Those data are not processed during the management of the call or the execution of the agreement, since they are not pertinent.

3.2 Selection

Some of the aforementioned data will be used as a basis for the selection of experts.

The services of the Controller search the database through Expert Management System in order to identify experts which could be suitably qualified (in terms of expertise, sectorial background etc.) for advising or assisting in the tasks listed in point 1 above.

In the related procedures described in the annex, personal data are processed within the duration of the particular multiannual programme requiring the experts, or if applicable, up to provision of publicity of the results of that procedure.

3.3 Management of the experts

The procedures carried out by the Controller and related to the management of experts during the execution of their tasks are described under point c of the document "Detailed description of the **processing**".

3.4 Publication of personal data of the experts

3.4.1 Experts with contract (evaluators and monitors)

In compliance with Article 40.5 of the Horizon 2020 Rules for Participation (Regulation (EU) No 1290/2013), the following data of experts appointed in a personal capacity and who have assisted the European Commission or the funding bodies in the implementation of Horizon 2020, shall be published at least once a year on the internet site of the Commission or the relevant funding body: name, first name, type (e.g. monitor, evaluator), gender, area of expertise, nationality, last employer incl. related location (= the Region on NUTS 2 level).

The publication shall be waived if such disclosure risks threatening the rights and freedoms of individuals concerned as protected by the Charter of Fundamental Rights of the EU[3].

To exercise this opt-out, the data subject should send his/her request to the Controller by using the contact information given under section 8 of the Privacy Statement, specifying the reasons why he/she opposes to the publication of his/her personal data.

3.4.2 Meeting experts and experts with contract (other than evaluators and monitors)

In addition, in case of 'Commission expert groups' (i.e. a group of experts which comprises at least two members and is foreseen to meet more than once), the personal data of these experts mentioned in the notification DPO-2194 of the Secretariat-General of the European Commission are published in the Commission Register of Expert Groups, in compliance with the horizontal rules for 'Commission expert groups'[4] and the provisions of the related notification.

The data published are the data which are collected via the 'Information sheet' attached to notification DPO-2194, to be provided to and filled in by the members of a group when created.

3.4.3 Any expert

When registering, experts can decide, through an explicit opt-in[5], to agree on the searchability and/or publication of parts of or their entire profile, to be used in the scope of the Partner(s) Search function implemented on the Participant Portal (PP). This function is accessible to users of the PP only, and experts can withdraw their agreement at any moment.

Experts are reminded that any effective participation in a proposal might lead to a conflict of interest which could exclude them from being contracted. Nevertheless, being in the scope of the Partner Search functionality cannot result as such in a conflict of interest.

The data subjects who have agreed to the searchability and/or publication indicated hereof can decide, through an implicit opt-in[6], to be part of an Anonymous Contact function implemented on the PP. This function allows any user to send a message to the data subject/profile owner, without disclosing the identity and contact data of the latter.

Moreover, personal data may be disclosed in the conditions laid down by Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents[7].

[1] Article 40 of the Horizon 2020 Rules for participation, Regulation (EU) No 1290/2013 of the European Parliament and of the Council of 11 December 2013 laying down the rules for participation and dissemination in "Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020)" and repealing Regulation (EC) No 1906/2006 (OJ L 347, 20.12.2013, p. 81).

[2] Regulation (EU, EURATOM) 2015/1929 of the European Parliament and of the Council of 28 October 2015 (OJ L 286, 30.10.2015) amending Regulation (EU, Euratom) No 966/2012 on the financial rules applicable to the general budget of the Union.

[3] In accordance with the Horizon 2020 Rules for Participation.

[4] C(2016)3300

[5] Box to be ticked by the data subject.

[6] Ticked box that can be unticked by the data subject.

[7] Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents (OJ L 145/43, 31.5.2001).

List of attachments

- List of programmes and initiatives (link of PS 1).pdf

4/ PURPOSE OR PURPOSES OF THE PROCESSING, AND PROCESSORS

The purpose of the processing operations is the selection and management (including reimbursements of expenses and payment where appropriate) of independent experts appointed by DG RTD to advise on or assist with:

- (a) The evaluation of proposals;
- (b) The monitoring of the implementation of actions carried out under Horizon 2020 as well as of previous Research and/or Innovation Programmes;
- (c) The implementation of Union research and innovation policy or programmes including Horizon 2020, as well as the achievement and functioning of the European Research Area;
- (d) The evaluation of Programmes and Initiatives;
- (e) The design of the Union research and innovation policy, including the preparation of future programmes.

In addition to these processing operations, REA provides administrative and logistical support to the Controller including the contracting and payment of expert evaluators. Modalities for such collaboration are outlined in Art 4.3 of EC Decision C(2013)9418[1] and its annex 3[2].

Finally, additional processing operations might be performed, only further to the prior-consent of the data subject:

- (a) Publication of chosen personal data within the scope of the Partner(s) Search function implemented on the Participant Portal (PP);
- (b) Anonymous Contact function provided to users of the PP.

[1] EC DECISION of 20.12.2013 on delegating powers to the Research Executive Agency with a view to performance of tasks linked to the implementation of Union programmes in the field of research and innovation comprising, in particular, implementation of appropriations entered in the general budget of the Union

[2] Annex III: Description of the administrative and logistical support services to be provided by the Agency

PROCESSORS:

4.1 Internal processors

Internal processors are Authorised staff of the Controllers participating in the selection and management of independent experts within the scope of the listed Programmes and Initiatives, for the following tasks:

- (i) Processing operations through different generic IT systems placed under the responsibility of Business Process Owners, located in the different services of the Research family (at RTD, REA, etc.);
- (ii) Development and maintenance of some IT systems (made by DG DIGIT and RTD);
- (iii) Some processing operations implemented by other DGs (e.g. payments with ABAC (Accrual Based Accounting) by DG BUDG, CORDIS (Community Research and Development Information Service) publications by the Publication Office, access control to EC premises by the Security Services), within the scope of their relevant notifications[1].

Any statutory staff is bound by the obligation of confidentiality with respect to any information they access within the scope of their assignment, as stipulated in the Staff Regulations(Article 17) and in the Conditions of Employment of Other Servants[2] (Article 11 § 1).

Article 17 (96):

- “1. An official shall refrain from any unauthorised disclosure of information received in the line of duty, unless that information has already been made public or is accessible to the public.
2. An official shall continue to be bound by this obligation after leaving the service.”

Article 11 (44) §1:

“The provisions of Articles 11 to 26 of the Staff Regulations, concerning the rights and obligations of officials, shall apply by analogy.”

In addition, some personal data may be disclosed in compliance with the applicable law to:

- (a) The Ombudsman;
- (c) The European Data Protection Supervisor (EDPS);
- (d) The audit and control bodies such as OLAF, Court of Auditors.

3.2 External processors (contractors, intra and extra-muros)

Any processing operations performed on behalf of the Controller by a contractor (a Processor) are pursuant to Regulation (EC) 45/2001. The subsequent obligations of the Processor are made mandatory via a dedicated contractual clause (enclosed).

In addition, any staff of contractors who work within the Controller premises and have to access EC IT systems must sign an individual declaration of confidentiality (enclosed).

[1] Cf. DPO-300 and DPO-372 of DG BUDG, DPO-1332 of the Publication Office, DPO-2638 of DG ADMIN, etc.

[2] Staff Regulations of Officials and Conditions of Employment of Other Servants of the European Communities as laid down by Articles 2 and 3 of Council Regulation (EEC, Euratom, ECSC) No 259/68 (OJ L 56, 4.3.1968).

List of attachments

- BUDG Clause.doc
- IT contractors working rules and declaration of confidentiality.doc

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Data subjects are natural persons who respond to calls for expression of interest and register as experts through the Participant Portal.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

6.1 On-line registration

The categories of personal data collected when registering online (Expert area in the Participant Portal) and further processed are for each data subject: identification and contact details, education, area of expertise, career, publications, achievements.

For more details, refer to the '**List of registration data**' published in the [Legal Notice of the PP](#).

6.2 Selection and management

The categories of personal data collected and further processed for selected experts are additional identification data, financial data, professional data and information forms (when applicable).

For more details, refer to the '**List of selection and contract management data**' published in the [Legal Notice of the PP](#).

6.2.1 Experts with contract

In addition to data mentioned in 6.2 above, under Horizon 2020, declarations prior to contract signature include the following categories of data:

- i. Change of point of departure for assignment (town/city of departure, country of departure, town/city of arrival, country of arrival, reason);
- ii. Conflict of interest: declaration of absence of conflict of interest or, in case of a conflict of interest, free text box for Expert to declare reason;
- iii. Code of conduct: declaration to abide by the terms of the code of conduct;

As well as:

- iv. Electronic signature of contract: Experts encode their European Commission Authentication Service (ECAS) credentials to sign the contract covering the assignment in question.

6.2.2 Meeting experts

Registration data and payment data collected for meeting experts are the same as for experts with contract (listed under 6.2.1. above).

In addition, experts might be asked to provide the Controller, prior to their appointment as Meeting expert, with:

- i. Declaration of acceptance for experts appointed in their personal capacity;
- ii. Declaration of acceptance for experts representing an organisation.

6.3 Special categories of data

In principle the Controller does not need to collect and process special categories of data^[1] as defined in Article 10.1 of Regulation (EC) No 45/2001 except in the following specific circumstances:

- a) It is needed to acquire extracts of judicial records for the detection of fraud related to the contract or procedures relating to sanctions according to the Financial Regulation and its rules of application.

This type of processing operations is justified under Article 106(1) of the revised Financial Regulation. Thus, the processing of this special category of data meets the requirements set out in Article 10.5 of Regulation (EC) No 45/2001;

b) The data subjects are free to provide voluntary health-related data due to their special needs in order to be refunded of possible additional costs relating to the subsequent accommodation and travel specificities. The processing operations of these health related data by DG RTD are justified according to Article 10(2)(a) of Regulation (EC) No 45/2001 on condition that these data are submitted on a voluntary basis and consequently with the data subject's consent. In any case, only necessary information would be collected in order to certify the existence of those special needs and related costs. To this aim, only one specific medical certificate from a national health service and an estimation of the additional costs made by a national medical centre is requested.

Any Controller's staff member in charge of the processing of health related data would be subject to the specific obligation of secrecy equivalent to that of a health professional according to Article 10(3) of Regulation (EC) No 45/2001, and might be requested to sign a specific professional secrecy declaration if necessary.

Irrelevant or excessive data are not retained by the Controller.

[\[1\]](#) Data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs, trade-union memberships, or data concerning health or sex life.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

The Controller provides information to the data subjects, in compliance with Articles 11 and 12 of Regulation (EC) No 45/2001, in a Privacy Statement, which is available:

- On the homepage of the Expert area in the Participant Portal (under the section Legal notice);
- In the initial on-line form where the experts select the programme(s) for which they wish to apply;
- In the 'Personal Details' section of the Expert area in the Participant Portal.

In addition, the call for expression of interest provides for a link to the Privacy Statement.

This Privacy Statement is common to all the Horizon 2020 Controllers who access and process personal data of experts who have registered through the Participant Portal.

The unambiguous consent of the experts is requested for the processing operations described in point c) of the 'List of recipients' referred to in chapter 16 at the time the experts register through the Expert Area of the Participant Portal by ticking the appropriate box.

In addition, for experts with contracts, a data protection clause is included in Article 11 "Processing of Personal Data" of the H2020 Model Contract for Experts and describes the legal obligations of the Contracting Party and of the expert.

List of attachments

- SSPS Experts H2020 .pdf

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

At any time, data subjects can access/verify/modify their personal data online upon logging on to the Expert area in the Participant Portal. They may also change their European Commission Authentication Service (ECAS) password which allows them to login to the system and update their personal information contained in their profile. The data subjects can also change at any time their choice for the opt-ins regarding access to their personal data.

In case they wish to delete their personal data, data subjects should send an email to the Controller, using the following functional mailbox: ec-expert-area@ec.europa.eu.

For local repositories, they can contact the Controller, the Director-General of DG RTDat: RTD-ASSISTANT-SECRETARIAT@ec.europa.eu.

For other questions further to their appointment for an assignment, data subjects can contact the Controller, by using the contact information given in their contract or invitation letter.

For more general information on data protection, data subjects may also contact the European Commission Data Protection Officer: DATA-PROTECTION-OFFICER@ec.europa.eu.

In any case, the details of the request must be specified.

Any information relating to the processing of personal data is detailed in the register of the Data Protection Officer of the European Commission:
<http://ec.europa.eu/dpo-register/search.htm>

Data subjects have the right to have recourse to the [European Data Protection Supervisor](#) (EDPS@edps.europa.eu)- preferably after a first contact with their Controller

9/ AUTOMATED / MANUAL PROCESSING OPERATION

All processing operations have an automated part. This point covers front-office automated processing operations and supporting IT systems for experts.

All EC IT systems are compliant with the [Commission Decision of 16 August 2006 C\(2006\) 3602 concerning the security of information systems used by the European Commission](#).

Besides, contractors which run IT systems on behalf of the EC, contractually abide by Regulation (EC) No 45/2001. They act only on instruction from the data Controller and undertake to adopt appropriate technical and organisational security measures having regard to the risks inherent in the processing and to the nature of the personal data concerned (cf. question "3. Processors" and the special clause on data protection which appears in EC contracts).

The processing of personal data in the frame of the selection and management of experts is mainly automated. While the selection of experts remains under the control of the various authorising officers of the responsible services, the management of contractual relationships with the experts and payments is under the remit of the Contracting Party.

10/ STORAGE MEDIA OF DATA

The collected/processed data in electronic format is stored in the Expert area in the Participant Portal database, on the servers (email server, ABAC, ARES, Expert area in the Participant Portal, EMI, etc.) of the European Commission. All configurations and operations abide by the relevant Commission decisions on IT security and provisions established by the Security Directorate of the European Commission (HR.DS) for this kind of servers and storage services.

The paper files are stored in operational and financial units of DG RTD in locked/secure cupboards and/or storage offices with limited access

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

According to Regulation (EC) No 45/2001, the data processing in the context of this notification is considered lawful because:

- It is necessary for the performance of a public interest tasks, namely the management of Horizon 2020 and other related Programmes and Initiatives managed by DG RTD, (Article 5(a) of Regulation (EC) No 45/2001); or
- It is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, namely the expert contract or other type of contract under Horizon 2020 and other related Programmes and Initiatives managed by DG RTD (Article 5(c) of Regulation (EC) No 45/2001); or
- The data subject has given his/her unambiguous prior-consent (Article 5(d) of Regulation (EC) No 45/2001).

The data processed by DG RTD in the context of this notification fall under Article 27 of Regulation (EC) No 45/2001 and has been prior-checked by the EDPS (C 2016-0950).

All the recommendations of the EDPS have been fully taken into account in the present notification. The legal bases confirming the lawfulness of the respective data processing operations are listed in the attachment 'Legal basis' and may be updated in the register of the Data Protection Officer of the European Commission to include new legal acts relevant for the Programmes and Initiatives managed by DG RTD.

List of attachments

- Excerpt from letter of the EDPS on retention period.pdf
- EDPS C 2016-0950.pdf
- Legal basis v2.pdf

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

Recipients of the Community institutions and bodies are reminded of their obligation to process the personal data provided to them only for the purposes for which they were transmitted according to Article 7(3) of Regulation (EC) No 45/2001.

The categories of recipients are:

- EU institutions and bodies;
- Member States;

- Third parties in the European Economic Area (EEA) and in countries for which the Commission has adopted an adequacy decision;
- Third parties in third countries with no adequacy decision, with additional safeguards;
- The public.

For more details, please refer to the ‘List of recipients’, published in the [Legal Notice of the Participant Portal](#). Disclosure to some categories of recipients require the prior consent of the data subject

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

13.1 Standard categories of data

- For experts selected by a Controller, personal data is kept for 10 years after the end of the particular programme on which they provided their services.[1]

The Legal Entity Files and Bank Account Files are also stored in the Accrual Based Accounting (ABAC) database which is administered by the European Commission (DG BUDG) and to which the Controllers have access.

Should the need arise to acquire extracts of judicial records for the detection of fraud related to the contract or procedures relating to sanctions according to the revised Financial Regulation and its rules of application[2], those extracts shall not be kept longer than two years after the accomplishment of the particular procedure.

Supporting documents relating to budget implementation are kept for at least five years from the date on which the European Parliament grants discharge for the budgetary year to which the documents relate[3]. The personal data contained in this type of supporting documents shall be deleted where possible when those data are not necessary for budgetary discharge, control and audit purposes.

Personal data contained in supporting documents are deleted where possible when these data are no longer necessary for budgetary discharge control and audit purposes.

- For experts not yet selected by a Controller, their personal data is kept for the duration of the related programme’s activities for which they have registered.

Experts are asked to indicate if they wish that their data be retained in the database of experts beyond this date in order to be considered for assignments for the forthcoming programme. If they do not wish to be considered for future assignments, their data are deleted from the database after the end of the programme[4]. Then the files are kept in the archives for maximum of five years following the end of the programme.

- For unsuccessful and withdrawn experts, their personal data may be retained only for up to 5 years after the end of the particular procedure to allow for all possible appeals.

Personal data not updated for 10 years will be removed from any relevant database.

Anonymous or encrypted data can be retained for a longer period for statistical, historical or scientific purposes.

13.2 Special categories of data

If health data are provided by the data subject to the Controller for accommodation and transportation purposes, any supporting documents containing these data are deleted, where possible, when these data are not necessary anymore for budgetary discharge control and audit purposes.

[1] As required by the Common Commission Retention List (CRL, SEC(2012)713).

[2] Commission delegated regulation (EU) 2015/2462 of 30 October 2015 amending Delegated Regulation (EU) No 1268/2012 on the rules of application of Regulation (EU, EURATOM) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union (L 342/7, 29.12.2015).

[3] In compliance with Article 48(d) of the Rules of Application of the Financial Regulation, *ibid.*

[4] For experts who have provided their ID (cf. section 6.1), the latter will not be eliminated from the Controller's data bases at the end of the retention period, unless the data subject has submitted a request for elimination to the Controller, at any time as from the end of the applicable retention period.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

Further to justified legitimate request of the data subject:

- Time limit to rule on a request: 15 working days (beginning from the reception of the request).
- Blocking period: On a case-by-case basis, but immediately if applicable (maximum delay of 5 working days).
- Erasure Period: Maximum delay of 5 working days after the ruling on the request (if applicable).

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification.

Statistics on experts' nationality, gender, field of expertise for example may be generated during the implementation of the programmes and also after their end., in a form that safeguards the data subject's anonymity

In addition, as referred to above, statistics on experts with contracts (name, first name, candidature number, ABAC references, number of days worked) may be generated during the implementation of the programmes , to comply with the rules on rotation of the experts.

These statistics will be retained for the duration of the Horizon 2020 framework programmes. Anonymous or encrypted data can be retained for a longer period for statistical, scientific or historical purposes.

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

In line with Regulation (EC) No 45/2001, personal data might be transferred to recipients other than Community institutions and bodies:

- Which are subject to Directive 95/46/EC[1] as repealed by Regulation (EU) 2016/679[2] , provided

that conditions under Article 8 (a) and (b) of Regulation (EC) No 45/2001 are met;

· Which are not subject to Directive 95/46/EC, provided that conditions under Article 9, paragraphs (1), (2), (6) and (7) of Regulation (EC) No 45/2001 are met.

[1] Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (OJ L 281 , 23/11/1995).

[2] 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) (Text with EEA relevance) (OJ L 119, 4.5.2016).

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING

Article 27.2.(b) Processing operations intended to evaluate personal aspects relating to the data subject and (d) processing operations for the purpose of excluding individuals from a right, benefit or contract.

17/ COMMENTS

The Controller's staff in operational Units may request and get access to information provided by experts. Payments are approved and carried forward by the Administration and Finance Units (AFU) only.

PLACE AND DATE: BRUXELLES, 19 OCTOBER 2016

DATA PROTECTION OFFICER: RENAUDIÈRE PHILIPPE

INSTITUTION OR BODY: THE EUROPEAN COMMISSION