



## **PROTECTION OF YOUR PERSONAL DATA**

**Privacy statement on the protection of personal data in relation to the participation to the survey.**

**Processing operation:** *Technical and Scientific Support to the Commission's Impact Assessment for the Revision of the Regulation on Classification, Labelling and Packaging of Substances and Mixtures (CLP) – Targeted stakeholder survey*

**Data Controller:** RPA Europe S.R.L.

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## **1. Introduction**

RPA Europe S.R.L. is committed to protect your personal data and to respect your privacy. We collect and further process 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, and the European Data Protection Supervisor.

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

**Purpose of the processing operation:** RPA Europe S.R.L. collects and uses your personal information within the framework of the study “Mapping objectives in the field of environmental taxation and budgetary reform: Environmentally harmful subsidies” commissioned by the European Commission DG Environment.

More specifically, this concerns the following processing activities:

- to obtain the views of the respondents of the targeted consultation activity. In view of the design, evaluation and revision of initiatives it is indispensable for the Commission to receive input and views from those who are considered to be concerned by the policy or initiative.
- to obtain the views of stakeholders to explore a subject for which very limited information is available. This exploratory targeted consultation activity (hereafter, 'targeted consultation') will provide further information to the Commission necessary to take basic conceptual decisions.
- to send updates/notifications concerning the targeted consultation, before and after it takes place.

The subject matter of the consultation activity requires you to provide personal data in your response. These personal data will only be published subject to your explicit consent.

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

To avoid misuse, anonymous contributions to *the consultation activity* may not be accepted.

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.

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**

We process your personal data, because:

- (a) processing is necessary for the performance of a task carried out in the public interest;
- (b) it is based on your consent, for one or more specified purposes:

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Company Registration Number (Italy): MI-2521013 - VAT number: IT 10304890964

- If the subject matter of a targeted consultation requires respondents to provide personal data in their response, their publication;
- if applicable, the processing of special categories of personal data.

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

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

In order to carry out this processing operation *the Data Controller* collects the following categories of personal data:

- *name and surname,*
- *country of operation,*
- *e-mail address of the respondent,*
- *the name of the organisation on whose behalf the participant is participating to the targeted consultation.*

#### **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, namely for a maximum of five years after the closure of the file to which the present stakeholder workshop belongs. A file is closed at the latest once there has been a final outcome in relation to the initiative to which the workshop contributed. This retention period is without prejudice to an earlier elimination of personal data not part of the file or cases of administrative elimination.

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 European 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 notifications [DPO-1530.4 ARES-NOMCOM. ARES \(Advanced Records System\) et NOMCOM \(Nomenclature Commune\)](#), [DPO-3871-3 Notification for the digital archival repository and ARCHISscanning](#) and [DPO-2806-5 Gestion des dossiers papier structurés par nom de personnes et transférés aux Archives Historiques](#)!).

#### **6. How do we protect and safeguard your personal data?**

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All personal data in electronic format are stored on the servers of RPA Europe S.R.L. which are located in the EU. All 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 European Commission.

In order to protect your personal data, RPA Europe S.R.L. 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 team 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 workshop. Such staff abide by statutory, and when required, additional confidentiality agreements.

*Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.*

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.

#### **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. 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. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

## **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.

RPA Europe S.R.L. [info@rpa-europe.eu](mailto:info@rpa-europe.eu)

### **- 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](mailto: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.