



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Preliminary and other non-contractual activities related to Twinning Projects.

Data Controller: Directorate General European Neighbourhood Policy and Enlargement Negotiations/ Directorate C/ Institution Building Unit (NEAR C3)

Record reference: Record DPR-EC-01893

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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 Twinning procedures, undertaken by Directorate General European Neighbourhood Policy and Enlargement Negotiations/ Directorate C/ Institution Building Unit (NEAR C3) is presented below.

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

Purpose of the processing operation:

Twinning is a European Union instrument for institutional cooperation between Public Administrations of EU Member States and of beneficiary or partner countries. Twinning projects bring together public sector expertise from EU Member States and beneficiary countries with the aim of achieving concrete mandatory operational results through peer to peer activities.

This record of processing aims to cover the following activities:

Organisation of Twinning activities and dissemination of relevant information related to the implementation of Twinning instrument. This process also includes exchange of information with the National contact Points.

RTA training sessions training session in Brussels on twinning procedures mainly for the Resident Twinning Advisers but also opened to other stakeholders of ongoing Twinning projects.

Support to the beneficiary institution and EU Delegations for drafting the Twinning fiche.

Entering information related to each Twinning project since pipeline status into the Twinning Database.

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

The processing operations on personal data linked to Preliminary and other non-contractual activities related to Twinning Projects are carried out on the basis of the following legislation:

Regulation (EU) 2021/947 of the European Parliament and of the Council of 9 June 2021 establishing the Neighbourhood, Development and International Cooperation Instrument – Global Europe, amending and repealing Decision No 466/2014/EU and repealing Regulation (EU) 2017/1601 and Council Regulation (EC, Euratom) No 480/2009 (Text with EEA relevance).

Regulation (EU) 2021/1529 of the European Parliament and of the Council of 15 September 2021 establishing the Instrument for Pre-Accession Assistance (IPA III) in the framework of the Multiannual Financial Framework (MFF) 2021-2027.

Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11.3.2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action.

Regulation (EU) No 231/2014 of the European Parliament and of the Council of 11.3.2014 establishing an Instrument for Pre-accession Assistance (IPA II).

Regulation (EU) No 232/2014 of the European Parliament and of the Council of 11.3.2014 establishing a European Neighbourhood Instrument.

Commission Decision (2017) 1122 authorising the reimbursement on the basis of unit costs and flat-rates in the framework of Twinning projects implemented by Member States through peer-to-peer administrative cooperation and for financing of Technical Assistance and Information Exchange's activities.

Commission Decision C(2019)7438 Final on the financing of the annual work programme relating to coordination and promotion of awareness on development issues for 2019 - implemented through -:

SLA between DG DEVCO and DG NEAR concerning the Technical Assistance and Information Exchange (TAIEX) and Twinning support to third countries, regions and territories eligible for measures supported by DG DEVCO.

We process your personal data, because:

(a) 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 as described by the above legislation;

(d) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

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

In order to carry out this processing operation the Institution Building Unit collects the following categories of personal data:

1) EU Delegation TCPs, Geographical Desk TCPs as well as other EC staff relevant for twinning operations in the context of Twinning Interservice Support Groups or dissemination of relevant information (e.g. Heads of Cooperation, Heads of Finance, Contracts and Audit section as well as personnel from the DG NEAR Centres of Thematic Expertise).

2) National Contact Points (NCPs)

for Twinning: each Member State (MS) and each Partner Country delegates a NCP to liaise with IBU and the other NCPs in the form of a network to assist with the management and organisation of the Twinning operations. The contact details of the Twinning network are maintained, used for organisation of activities and dissemination of relevant information and published in the Europa website.

3) Resident Twinning Advisers (RTAs)

and other officials entitled to participate in RTA training sessions: RTAs are experts from EU MS, which are deployed in the Partner Country for the whole duration of each Twinning contract.

Those experts, together with other selected officials (EU MS Project Leader and either the counterpart of the RTA or the Project Leader from Partner Country) are entitled to receive a training session in Brussels on twinning procedures. Those trainings are organised by IBU at least one time per year.

4) Persons included in a given twinning proposal - any information related to Twinning applicants: IBU act as backup for EU Delegations and Contracting Authorities and its functional mailbox (NEAR-Twinning@ec.europa.eu) is in CC of all call for proposals for Twinning projects as well as for other steps the selection process. The purpose is not to process information but to retain information for statistical purposes (e.g. when the call for proposals are launched and until when, which Member States apply, which proposal is awarded and other similar information items).

The purpose of the processing does not include award procedures and contract implementation which are covered by DPR-EC-01706.

5. How long do we keep your personal data?

The Institution Building Unit only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

Personal data processed for the purpose of organisation and management of the training/events (this includes the information given during the registration, before, during or after the event) is retained three years after the last action in relation to the training or event, which is the maximum duration of deployment of an RTA in the same twinning project, according to the Twinning Manual.

Sensitive personal data relating to dietary requirements, accessibility (if provided) 1 month after the end of the event for which the information was provided to the IBU.

Personal data collected to issue badges in order for the data subjects to gain access to Commission buildings, six months after the termination of the link between the data subject and the Commission - Record of Processing DPR-EC-00655 (Commission Physical Access Control System (PACS)).

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 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.

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.

All staff in IBU working on Twinning have full access to the data submitted from all the data subjects or their institution or origin with their permission. All call for proposals are made available through the portal PROSPECT, including Twinning fiches. The contracts are made available on the Common Relex Information System (CRIS) system and as such are accessible to anyone with access to CRIS.

Public officials from both, MS administrations and Partner administrations, can be recipients of information in the context of the organisation of the Training sessions for Resident Twinning Advisers. The information is circulated via e-mail to the addresses provided by the subjects. The controller will transfer your personal data based on the following:

The NCPs for Twinning receive information of statistical nature related to the Twinning instrument as well as information related to the projects where Public officials from his/her administration may be involved. The information is mainly circulated by e-mail to the professional e-mail addresses.

The transfer 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 and the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

[Please note that pursuant to Article 3(13) of the 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. 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) on grounds relating to your particular situation

You have consented to provide or you have authorised the National Contact Point to provide your personal data to the Institution Building Unit 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, 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 (NEAR-TWINNING@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:

Record DPR-EC-01893