



European Committee
of the Regions

Record of processing activity – Working document

Access to documents

PART 1 - Record

1. General Information

Reference number	RA1-1
Last update	04/12/2023
Controller	European Committee of the Regions
Directorate	Directorate A
Unit	A.1 Services to members
Contact details	transparence@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	Available internally
DPO contact details	data.protection@cor.europa.eu
Processor(s)	N/A
Data processing agreement	Available internally

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The purpose is to handle requests for access to documents lodged under Regulation (EC) No 1049/2001 within the prescribed legal deadlines and of establishing an annual statistical report as required by Article 17(1) of this Regulation.</p> <p>Furthermore, certain processing of personal data contained in the documents to be disclosed may be necessary to provide public access to a register of documents, as foreseen by Article 11 of this Regulation and further specified in CoR Decision No 18/2020 of 9 October 2020 on public access to CoR documents. The CoR register of public documents is accessible via this link (https://dmsearch.cor.europa.eu/search/public).</p> <p>The personal data may also be processed for the purpose of following up on an enquiry by the European Ombudsman or in case of court proceedings before the EU Court of Justice.</p>
Categories of persons whose personal data are processed	<ul style="list-style-type: none">- Every individual who submits a request for access to documents held by the CoR under Regulation (EC) No 1049/2001;- Every other individual whose personal data are included in requests for access to documents submitted by applicants, or which are contained in the documents requested;- Contact data of third party representatives who are consulted in the context of third-party consultations pursuant to Article 4(4) of

	Regulation (EC) No 1049/2001.
Categories of personal data processed	<p>a) Personal data of the individual who submits a request for access to documents held by the CoR under Regulation (EC) No 1049/2001:</p> <p>i) Mandatory personal data: name and surname, e-mail, postal address (for requests submitted via mail)</p> <p>ii) Optional personal data: phone number, postal address, organisation, legal representative, profile of the applicant.</p> <p>b) Personal data of the applicant and other individuals contained in the request as well as in any other correspondence exchanged between the applicant and the CoR (reply to the request, deadline extension letter, clarification request, etc.);</p> <p>c) Personal data contained in the documents requested if released under Regulation (EC) No 1049/2001 and CoR Decision 18/2020</p> <p>d) Personal data of third party representatives who are consulted in the context of third-party consultations pursuant to Article 4(4) of Regulation (EC) No 1049/2001;</p> <p>e) When there are reasonable doubts concerning the identity of the natural person making the request, the CoR may ask the applicant to provide a copy of an identification document (for example, a passport or identity card) in order to verify his/her identity, in the following exceptional circumstances:</p> <ul style="list-style-type: none"> - where the documents concerned by the request contain the applicant's own personal data and the applicant is granted individual access to such documents; - where there are legitimate reasons to consider that the right to access stemming from Regulation (EC) No 1049/2001 is being abused by that particular applicant. <p>The identification document should contain the applicant's name and, if applicable, his/her postal address, while any other data such as a photograph or any personal characteristics may be blacked out.</p> <p>The processing operation concerning any 'special categories of data' which fall(s) under Article 10(1) shall be prohibited unless any of the reasons under Article 10(2) applies.</p>
Recipients of the personal data	<p>The application is transferred by the Access to documents and Transparency Unit to another service within the CoR, when necessary to collect the requested document and to coordinate the response, so notably with the service responsible for the requested documents, the DPO and the Legal Affairs unit.</p> <p>Personal data submitted by the applicants are not disclosed outside the CoR, except to the extent necessary for dispatching a letter by registered mail or if required so by law.</p> <p>Personal data that appear in the documents requested may be disclosed to the public following an assessment under Regulation (EC) No 1049/2001, read in conjunction with Article 9 of Regulation (EU) 2018/1725. If the applicant resides outside the EEA, personal</p>

	<p>data included in the documents disclosed may be transferred if such transfer additionally fulfils the conditions of Chapter V of the latter Regulation.</p> <p>Public documents are available on the CoR website Document Search (https://dmsearch.cor.europa.eu/search/public).</p>
Transfers of personal data to a third country or an international organization	<p>The CoR may reply to an applicant requesting access to documents under Regulation 1049/2001 residing in any country outside the EU.</p> <p>Apart from the applicant's own personal data, the CoR only discloses personal data to an applicant residing outside the EU if the conditions for a transfer of personal data to a third country or an international organisation under Chapter V of Regulation (EU) 2018/1725 are met.</p>
Retention period of the personal data	<p>The retention period is maximum five (5) years after the closure of a case-file.</p> <p>A file is considered closed after the CoR decision has become final, unless follow-up is required by an enquiry of the European Ombudsman or annulment before the EU Court of Justice. In such a case, a file is considered closed when the European Ombudsman or the EU Court confirms the decision or when the CoR completes the follow-up requested by the Ombudsman or the EU Court in its judgment.</p>
General description of security measures, where possible	<ul style="list-style-type: none"> - Regarding paper files: The requests in paper form are filed in the intermediate archives during its retention period. - Regarding digital data: The requests in electronic form are stored in the CoR Databases and servers.
Data protection notice	Available internally