



European Committee
of the Regions

Record of processing activity – Working document

EU Sign

PART 1 - Record

1. General Information

Reference number	RE4-1
Last update	08/08/2023
Controller	European Committee of the Regions
Directorate	Directorate E
Unit	E.4 Financial management
Contact details	EU-Sign-CoR@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 present data protection notice focusses on the steps of the QeS certificate issuance process for which the delegated CoR controller is directly responsible.</p> <p>This implies processing of your personal data for the following three internal processing purposes:</p> <p>A) Assessment of eligibility for the creation of a QeS profile</p> <p>QeS profiles are created on a service needs basis only, for CoR staff members and other relevant beneficiaries whose functions requires them to regularly sign documents in electronic form which, for reasons of legal validity, must bear a qualified electronic signature. This notably includes the CoR President, the CoR First Vice-President, CoR authorising officers and possibly other relevant CoR staff members.</p> <p>Whenever the creation of a QeS profile is requested, the delegated controller processes personal data in order to assess the eligibility of the CoR requester for a QeS, notably considering the justification they provided in their request (such as, for instance, type and number of legal documents/commitments to be signed). Requests for the creation of a QeS profile are submitted on a voluntary basis by CoR staff members and other relevant beneficiaries.</p> <p>The delegated controller processes personal data also when monitoring the eligibility of CoR requesters on the long run and when requesting the deletion of invalid QeS profiles.</p>
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	<p>B) Transfer of relevant personal data to the European Commission When a request for the creation of a QeS profile is deemed eligible, the delegated controller transfers relevant personal data (identification and contact data) to the European Commission's Directorate-General for Informatics (DG DIGIT). Pursuant to a service-level agreement (n° DIGIT-056-2020 – 08/12/2020) and an EU Sign-related addendum (n° 1 – 10/09/2021), DG DIGIT (Unit D.3 - DIGITAL IDENTITY AND SIGNATURE SERVICE – DIGIT-DATA-PROTECTION-COORDINATOR@ec.europa.eu) is solely responsible for the creation and deletion of QeS profiles, and thus for contacting the CoR requester directly in order to collect the personal data necessary for the creation of their QeS profile. DG DIGIT acts as a controller when processing the personal data it collects from the CoR requester (see information about such processing here: https://ec.europa.eu/dpo-register/detail/DPR-EC-03186). DG DIGIT uses an external contractor for delivering certain EU Sign-related services: DigitalSign - Certificadora Digital, S.A. – Largo Pe. Bernardino Ribeiro Fernandes, 264835-489 Nespereira – Guimarães, Portugal (see information about such processing here: https://www.digitalsign.pt/media/files/Downloads/privacy-policy-digitalsign.pdf)</p> <p>C) First-level ICT support for CoR holders of a QeS profile The delegated controller processes personal data when providing first-level ICT support for CoR holders of a QeS profile, including when transferring to DG DIGIT support requests that the CoR designated helpdesk cannot handle.</p>
Categories of persons whose personal data are processed	Internal to the organisation: CoR President; CoR First Vice President; statutory staff members of the CoR.
Categories of personal data processed	<ul style="list-style-type: none"> • Identification data: forename, surname • Contact data: corporate email address, corporate phone number • Professional data: function(s)/assignment, career, QeS profile • Electronic communications: emails
Recipients of the personal data	<p>Within the institution: Statutory staff members of the CoR assigned to the delegated controller, on a need-to-know basis [all data categories].</p> <p>Outside the institution: Staff members of the European Commission assigned to the electronic signature service at DG DIGIT [identification data and contact data only].</p>
Transfers of personal data to a third country or an international organization	No, your personal data will not be transferred to a third country or international organisation.
Retention period of the personal data	<p>The following personal data related to a CoR requester, as well as data regarding the justification provided, are kept for the entire period during which that CoR requester holds a QeS profile:</p> <ul style="list-style-type: none"> • Identification data: forename, surname • Contact data: corporate email address, corporate phone number • Professional data: function(s)/assignment, career, QeS

	<p>profile.</p> <p>Electronic communications (emails) between the delegated controller and a CoR requester related to the latter's QeS profile are kept for a period of two (2) years.</p> <p>The following data are kept for a period of seven (7) years after the date of termination of the QeS certificate issued to a CoR requester, for sound financial management purposes in compliance with the provisions of article 75 FR (requiring essential supporting documents to be kept at least five years from the date on which the European Parliament gives discharge for the financial year to which the documents relate):</p> <ul style="list-style-type: none"> • Identification data: forename, surname • Professional data: QeS profile (date of issuance and date of termination of the QeS certificate)
<p>General description of security measures, where possible</p>	<p>Personal data processed by the delegated controller are exchanged via a dedicated functional mailbox and stored on a dedicated shared drive, with limited need-to-know-based access rights.</p>
<p>Data protection notice</p>	<p>Published internally</p>