



European Committee
of the Regions

Record of processing activity – Working document

KIKLOS

PART 1 - Record

1. General Information

Reference number	RD3-1
Last update	23/02/2024
Controller	European Committee of the Regions
Directorate	Directorate D
Unit	D.3 Digital communication and IT strategy
Contact details	kiklos@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	Available internally
DPO contact details	data.protection@cor.europa.eu
Processor(s)	Innocraft providing 'Matomo' tool for web analytics: https://matomo.org/matomo-cloud-dpa/
Data processing agreement	Available internally

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The KIKLOS application is an internal working tool to create, edit, plan, follow up and optimize the legislative work of the CoR. It is addressed to accredited users, staff and Members, from CoR, EESC and Joint Services.</p> <p>Data subjects' personal data are collected and further processed for the purposes of measurement, usage monitoring and performance evaluation. It does not entail any kind of staff evaluation or personal preferences data usage. In this regard, personal data may be processed by the web analytics tool "Matomo".</p>
Categories of persons whose personal data are processed	CoR and EESC staff members (authenticated users).
Categories of personal data processed	<p>The name, first name and the function of persons involved in the legislative work of the CoR.</p> <p>User traffic is recorded anonymously with the Matomo web analytics tool and used solely for the KIKLOS data collection regarding measurement purposes, usage monitoring and performance evaluation and analysis. Examples of data collected are: page views, visits, unique visitors, site search, countries, members and devices used.</p>

Recipients of the personal data	<p>Access to data is defined by KIKLOS permission groups:</p> <ul style="list-style-type: none"> - KIKLOS Owners are staff members dealing specifically with KIKLOS and have full control rights. - KIKLOS Contributors are responsible for editing content on their respective sections of the KIKLOS (texts, documents) and have read- and contribute-rights. - KIKLOS Visitors are all EESC-CoR users identified with a user name and password. They have read-only rights. - Matomo web analytics superuser are authorised staff of the EESC-CoR IT unit have super user access to the Matomo web analytics tool. They have the possibility to enable or disable anonymisation of personal data, such as the IP addresses and user id. By default the user traffic is anonymised. - Innocraft staff get to access anonymised data only to create analytics reports, used solely for the KIKLOS data collection regarding measurement purposes, usage monitoring and performance evaluation and analysis. Examples of data collected are: page views, visits, unique visitors, site search, countries, members and devices used. - Access to anonymised data is disclosed to staff and members of the CoR via the regular reports done by KIKLOS.
Transfers of personal data to a third country or an international organization	<p>No transfer of personal data to a third country takes place. The anonymized user traffic data are stored in a database in Matomo Cloud, on servers located in Frankfurt and Dublin.</p>
Retention period of the personal data	<p>The dynamic text, documents, videos, references, that may contain personal data, is accessible until the staff responsible for KIKLOS removes it.</p> <p>Matomo web analytics: All raw data are deleted after 24 months and 24 days.</p>
General description of security measures, where possible	<p>See DPA of Innocraft www.innocraft.cloud/dpa. Only a very limited number of authorised staff (Matomo web analytics superuser in the IT Unit) have the possibility to disable the anonymization of personal data processed.</p>
Data protection notice	Published internally