

**PRIVACY STATEMENT for processing of personal data in the context of
the EU Health Policy Platform and the EU Health Award**

Directorate-General of the European Commission responsible: **DG SANTE**

1. CONTEXT AND CONTROLLER

As the Commission service collects and further processes personal data, it is subject 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.

The EU Health Policy Platform (HPP) is a collaborative, interactive platform that evolved from a consultative group (EU Health Policy Forum) to a multilateral communication channel between the Commission and its health stakeholders. The new format of the HPP is conceived to increase the sharing of ideas and good practices between public health stakeholders in the EU themselves and between them and the Commission.

The HPP operates through the following three axes: (1) Web platform to enable online discussion and collaboration; (2) face-to-face meetings and the (3) EU Health Award.

Within the HPP there are five types of networks:

- 1) **The Agora Network**, as an open discussion area accessible to all stakeholders who registered in the Web Platform (targeted users related to the field of Public Health);
- (2) **Four temporary Thematic Networks** accessible to all registered users to facilitate their drafting of Joint Statements on chosen health issues;
- (3) **Exchange networks such as "Fems: Doctors' working conditions and remuneration across Europe"**, which aim is to discuss about ways to improve doctors' working conditions and remuneration across Europe;
- (4) **Stakeholder networks**, created in response to a direct request from stakeholders, who are already approved members of the Agora network, wishing to use the Platform to share knowledge and information.
- (5) **Commission and Member State led networks**, created in response to policy decisions, implementation of Commission's initiatives such as health programmes, joint actions, expert groups, cooperation with International Organisations, etc.

The EU Health Award is organized under the EU Health Policy Platform, both funded under the 3rd Health Programme 2014-2020". It is organized annually to recognize the vital role of the European, national and/or subnational non-governmental bodies. Cities and schools may also be considered as categories for the Award if included as such in the Annual Work Plan.

Processing operations are under the responsibility of Unit C.2 “Health Information and Integration in all policies”, Directorate-General for Health and Food Safety (hereby DG SANTE), European Commission, acting as Controller.

2. WHAT PERSONAL INFORMATION DO WE COLLECT, FOR WHAT PURPOSE AND THROUGH WHICH TECHNICAL MEANS?

When clicking on the log-in tab, present in the EU Health Policy Platform webpage, stakeholders will be directed to an interactive platform where, after registration (via European Commission Authentication Service-ECAS/ EU-login) and request of access, they become part of a general network named Agora Network and receive automatic access to the Thematic and Exchange networks. Then, upon request, they can also become part of other specific Stakeholder and Commission and Member State led networks according to their needs and field of expertise. Each network has a newsfeed where stakeholders can post items (news, comments, links and documents) with different degrees of restriction (to all networks – through the Agora, or only to my network). They are able to comment on posts and discuss new ideas. Network members are able to exchange and store documents, promote and participate in events, create opinion polls, start a discussion and request access to another network. More networks are regularly created according to the needs of DG Health and Food Safety and stakeholders.

The data subjects concerned are members of already established EU Expert and Stakeholder Groups of DG Health and Food Safety, European Commission staff and health stakeholders involved in health policy who are registered in the Platform. Policy officers of the European Commission may act as moderators of Commission and Member State led networks, which means that their personal data is visible for the group members.

Types of processed personal data:

The data fields are the personal data required in order to sign up to ECAS/EU login: e-mail address, first name, last name, username. The e-mail address will only be visible to the system administrator.

Furthermore, each stakeholder who is a member of a network will be able to create a profile by entering, at his/her choice, the following personal data categories: name, surname, picture, and location, email addresses (personal and professional), phone number, skype address, memberships in the networks, and organisation he/she belongs to, as well as comments / opinions. These data are published on his/her profile and will be visible to all stakeholders registered in the HPP. The moderator of each network shall ensure that the discussions in the group are not related to a specific individual's personal health data.

Regarding the EU Health Award, personal data collected and further processed concerns the non-governmental bodies (civil society organisations) participating in the selection procedure for the EU Health Award. It may also concern cities and schools if these two categories are included in the specific call text that reflects the needs of the Annual Work Plan. Information can relate to all or some of the following data:

- Name of the organization;
- Name of the contact person;
- Description of the organisation aims and mission;
- Function of the contact person;
- Contact details (e-mail address, business telephone number, mobile telephone number, fax number, postal address, company and department, country of residence, internet address);
- Declaration on honour that they are not in one of the exclusion situations referred to in article Articles 106 and 107 of the Financial Regulation.

No special personal data categories, as described in article 10 of Regulation (EU) 2018/1725, are processed in the context of this processing operation.

Purpose

The general purpose for the processing of personal data in the context of the EU Health Policy Platform is to enable the sharing of ideas and good practices between public health stakeholders in the EU, among themselves and with the Commission, as well as to disseminate their views within the specific networks they belong to, and be informed about events and information relevant to health policies through the HPP.

Regarding the EU Health Award, upon reception of applications by DG SANTE, applicants' personal data is collected and further processed for the purpose of the management and administration of the selection of the winners by the Commission services.

Legal bases

The legal bases for the processing operations on personal data are:

- Council Regulation (EC, Euratom) N° 966/2012 of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No 1605/2002 "the Financial Regulation", in particular Articles 106 (1), 107 (1), 138 (2), Article 132 (1), Article 132 (2).
- Commission Delegated Regulation (EU) No 1268/2012 of 29 October 2012 on the rules of application of Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council on the financial rules applicable to the general budget of the Union, "the Implementing Rules", in particular Article 202 and Article 203.
- Commission implementing decision of 26.1.2017 concerning the work programme for 2017 in the framework of the third Programme of the Union's action in the field of health (2014-2020) and the EU financial contribution to the WHO Framework Convention on Tobacco Control, serving as a financing decision and its annexes. The annexes to the Annual Work Plan for 2017 refer, under Prizes, to the EU Health Policy Platform and to the EU Health Award.
- This processing operation is lawful under Article 5, point (a), of Regulation (EU) 2018/1725.

Technical means

Visitors of the HPP website will be prompted to register in the HPP. If they haven't done so yet, they are asked to create an ECAS/EU Login account.

Regarding the EU Health Award, personal data are processed when applications are submitted. The information is collected in files stored in an isolated secure system. The information is processed by the European Commission staff and transferred to Commission systems (as described in point 4.), under the responsibility of the Controller.

3. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHOM IS IT DISCLOSED?

For the purpose detailed above, access to your personal data is given to the following persons, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with European Union law, personal data in the HPP is disclosed to:

- Users registered in the HPP (who are able to read comments and certain personal data categories of other users – first name, family name, picture and organisation of the contributor - and only if the person chooses to make the post visible to the whole Platform).
- Commission staff, as well as external experts and contractors who work on behalf of the Commission for the purposes of management of the selection procedure (in the case of the EU Health Award), and the bodies charged with a monitoring or inspection task in application of Union law (e.g. internal audits, Financial Irregularities Panel, European Anti-fraud Office - OLAF);

Access to the personal data of data subjects submitted through their application as contact points of an organisation is not provided via the EU Health Policy Platform or the EU Health Award to members of the public without prior consent of the data subjects.

4. How DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

Users are allowed to choose whom they share their personal data with within the Platform. In addition, all exchanges of information done in the HPP's Agora Network are checked a posteriori by a moderator from the Commission services, following the Terms and Conditions as well as the Working Methods of the HPP which includes references to good practices to be followed by registered users. The Stakeholder and Commission and Member States led Networks are managed and moderated by designated stakeholder representatives or, where applicable, the policy officer in charge of that specific file.

The collected personal data and all related information are stored on servers of a computer center of DG DIGIT issuing the call for application. The Commission premises and operations of all computer centers abide by the Commission's security decisions and provisions established by the Directorate General Human Resources and Security.

5. How CAN YOU VERIFY, MODIFY OR DELETE YOUR INFORMATION?

Regarding personal data processed in EU Login / ECAS, data subjects are entitled to access, verify and correct it themselves, at any time. In order to delete their profile, however, they need to send an email to the functional mailbox (see section 7 below). Regarding SAAS2, users have to send an email to the functional mailbox (see section 7 below) in order to exercise their rights. As for the deletion of users' personal data in SAAS2, this occurs two months after the deletion in EU Login / ECAS. If the user wants to erase their personal data from SAAS2 before the two-month period, they are required to send an email to the functional mailbox (see section 7 below).

Personal data entered in a network member's profile in the EU Health Policy Platform can be accessed, verified, corrected and deleted by the users themselves at any given time.

In case data subjects wish to verify which personal data is stored, have it modified, corrected or deleted, or object to its processing, they are requested to contact the Commission, using the Contact Information below and explicitly specify their request. Special attention is drawn to the consequences of a request for deletion, in which case any possibility to re-contact the data subject will be lost.

6. HOW LONG DO WE KEEP YOUR DATA?

Personal data of HPP users will be kept for as long as their account is active (functional email address). After two months following the deletion from ECAS of the user profile, personal data will be also deleted by SAAS2. For the data in SAAS2, once a person is removed from any access to any DG SANTE system, the data will not be kept longer than one month after the initial date of deletion.

Regarding the EU Health Award, personal data will be used for abovementioned purposes and kept:

- Until the end of the EU Health Award procedure (1 year from announcement), and in the archives for a period of 5 years following the Award ceremony; which leads to a total of 6 years.
- Until the end of a possible audit if one started during above mentioned 6 years.

7. CONTACT INFORMATION

In case you wish to verify which personal data is stored, have it modified, corrected, or deleted, or if you have questions regarding the personal information processed in the context of the meeting, or concerning your rights, feel free to contact the support team by explicitly specifying your request, at:

DG Health and Food Safety, European Commission.

Unit C2 “Health Information and Integration in all policies”, Directorate C “Public Health”

EU Health Policy Platform Team

Functional Mailbox: SANTE-HPP@ec.europa.eu

Telephone number: +352 4301 32024

Office 03/097

L-2557 Luxembourg

8. RECOURSE

Remarks can be addressed to the Commission [Data Protection Officer](#).

Complaints can be addressed to the [European Data Protection Supervisor](#):