PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Management of personnel files of Conference Interpreting Agents (ACIs), Provision of Quality Interpretation and Payment of ACIs – including payment of ACI contracts, travel expenses, insurance payments and access cards

Data Controller: DG Interpretation, Unit B4

Record reference: DPR-EC-00431. DPR-EC—00419 and DPR-EC-00506

Table of Contents

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
10. Where to find more detailed information?
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 of personal data of interpreters, covers both officials and freelance interpreters from when they join the service (either as an official or as a freelance interpreter) and deals with all aspects of an interpreters’ professional life in the Institution. This process is undertaken by Directorate B, DG Interpretation and includes: the assignment to meetings; management and tracking of time slots for staff interpreters; the management of freelance interpreters’ personnel files; the payment of the ACI contracts, travel expenses and insurance payments and the management of their access cards to the Institution.

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

Purpose of the processing operation: The Units in Directorate B of DG Interpretation collect and use the personal information of interpreters, both officials and freelance interpreters, to manage the assignment of interpreters to meetings (physical, hybrid or virtual meetings) and to manage the administrative aspects of the career of a freelance interpreter over their professional life in the Institutions.

Using MIM (Meeting and Interpretation Management) system, which is a series of applications and web tools developed by DG Interpretation, the processing of personal data is managed at different stages by specialist teams within the DG. As the modules in MIM access a single database where all the information is stored, the modules are managed separately, although they all depend on the same key data. For this reason there are three separate records of processing for different key steps, but one privacy statement which explains clearly to data subjects how, where and why their data is processed.

Detailed information on each processing operation is contained in the individual record, however they broadly cover the following areas: assigning interpreters (staff and freelance interpreters) to meetings; tracking interpreter’s time slot management; invitation of candidates to adjunction of language tests; payments of ACIs; reports; business continuity management purposes (i.e. to prepare, through exercises, and respond to crises and operational disruptions affecting the normal functioning of the Commission).

In particular, personal data of freelance interpreters (ACIs) is collected in order to execute the payment of remuneration, allowances, contributions to pension funds, travel insurance and reimbursement of travel expenses, or any other payment related to a contract awarded by the EU institutions (DG SCIC, PE, Court of Justice).
The records of processing also cover the transfer of personal data to other EU institutions (Parliament and Court of Justice) for the functioning of the language services as well as the transfer of personal information to Member States and to the Commission’s Representations.

The personal data collected will not be used for an automated decision-making including profiling.

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

Directorate B in DG Interpretation, processes the personal data of staff interpreters in order to carry out the procedures in the name of the Commission in line with Title II of the Staff Regulations of Officials of the European Union and in conformity with the Rules on working conditions applicable to permanent and temporary staff interpreters (Ref: Ares(2014)3853612).

(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;

Directorate B in DG Interpretation, processes the personal data of freelance interpreters in order to carry out the procedures in the name of the Commission in line with revised Convention (the Agreement on working conditions and the pecuniary regime for freelance interpreters (ACIs) recruited by the Institutions of the European Union) of 1st September 2008 and the Implementing Rules of the revised Convention applicable as of 1st September, 2008.

(c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

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

In order to carry out this processing operation the Units in Directorate B collects the following categories of personal data:

Personal data = any information relating to an identified or identifiable natural person, for example this can include the following:

- Full Name; Nationality, Passport or ID card information, Date of Birth
- Contact details: such as e-mail address, telephone number, mobile telephone number, fax number, postal address, in case of emergency (ICE) contact.
- Professional information: languages; professional domicile (for freelance interpreters), etc.;
- Bank account reference (IBAN and BIC codes);
- Information for the evaluation of selection criteria or eligibility criteria: expertise, technical skills and languages, educational background, professional experience, including details on current and past employment;

The provision of personal data is mandatory to meet a statutory or a contractual requirement, depending on whether the interpreter is an official or a freelance interpreter. If you do not provide your personal data, possible consequences are that contracts and/or missions may not be possible.
5. **How long do we keep your personal data?**

The Units in Directorate B only keep(s) your personal data for the time necessary to fulfil the purpose of collection or further processing.

The retention schedules are listed in more detail in the record of processing for each of the separate processing operations, but the personnel files of European Commission officials and freelance interpreters are kept for 100 years after the date of their recruitment (in the case of freelance interpreters, this counts from when they pass the accreditation test).

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 on the servers of the European Commission. All processing operations are carried out pursuant to the [Commission Decision (EU, Euratom) 2017/46](http://eur-lex.europa.eu) of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the Commission has put in place a number of technical in place and organisational measures. 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. This includes transfers to other European Union Institutions and bodies and the Presidency Teams in the Member States.

The controller may transfer your personal data to recipients in a third country in accordance with Regulation (EU) 2018/1725:

The basis for the transfer is explained in the individual records of processing and the derogations will also be indicated should there be a need to do so.

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 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, **SCIC-AIC-WEB@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: DPR-EC-00431, DPR-EC—00419 and DPR-EC-00506