



PRIVACY STATEMENT

Processing of personal data in the context of access to documents

1. Introduction

The protection of your personal data is of high importance to the Smart Networks and Services Joint Undertaking (SNS JU). SNS JU is committed to respecting and protecting your personal data and ensuring your rights as a data subject.

All personal data processed in the framework of requests for access to documents are handled fairly, lawfully and with due care.

This processing operation is subject to Regulation (EU) 2018/1725. The present privacy statement is provided pursuant to Articles 15 and 16 of that Regulation.

2. Controller

The controller for this processing operation is:

Smart Networks and Services Joint Undertaking (SNS JU)

Avenue de la Toison d'Or 56-60

1060 Brussels, Belgium

Email: data-protection@sns-ju.eu

SNS JU has appointed a Data Protection Officer (DPO), who can be contacted at the same address.

3. Purpose of the processing

Personal data are processed for the handling of requests for public access to documents in accordance with applicable EU rules, including:

- registration and management of initial and confirmatory applications
- verification of the identity of applicants where necessary
- assessment and handling of requests
- consultation of third parties where required
- preparation and adoption of decisions on access
- communication with applicants
- record-keeping and archiving of requests and related correspondence

4. Categories of data subjects

The processing concerns:

- individuals submitting requests for access to documents
- representatives of organisations submitting such requests
- third parties whose data may be included in requested documents

5. Personal data processed and legal basis

Personal data processed

SNS JU may process the following categories of personal data:

- identification data (name, surname)
- contact details (email address, postal address)
- information related to the request (content of the request, correspondence, documents requested)
- any personal data contained in the requested documents
- administrative data related to the handling of the request

Legal basis

Processing is based on:

- Article 5(1)(a) of Regulation (EU) 2018/1725 (task carried out in the public interest)
- Article 5(1)(b) of Regulation (EU) 2018/1725 (compliance with legal obligations)

Processing is necessary to comply with Regulation (EC) No 1049/2001 regarding public access to documents.

6. Source of the data

Personal data are:

- provided directly by applicants
- generated during the handling of requests
- contained in documents held by SNS JU
- obtained from third parties where consultation is required

7. Recipients of the data

Access to personal data is granted on a need-to-know basis to:

- authorised SNS JU staff responsible for handling access to documents requests
- European Commission services or other EU institutions where consultation is required
- third parties consulted in the context of the request
- judicial or supervisory authorities where necessary

Where access is granted, documents may be disclosed to applicants or made publicly available in accordance with applicable rules.

8. Transfers to third countries

In principle, personal data are processed within the European Economic Area (EEA).

Where transfers to third countries occur (e.g. when an applicant is located outside the EEA), they are carried out in compliance with Regulation (EU) 2018/1725.

9. Data retention

Personal data are retained:

- for up to 10 years following the closure of the request

This retention period ensures compliance with administrative, legal and audit requirements. At the end of the retention period, data are securely deleted.

10. Security measures

SNS JU implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including:

- secure IT systems and controlled access rights
- role-based access to data
- confidentiality obligations for staff and experts
- monitoring and protection of IT infrastructure

11. Rights of data subjects

Under Regulation (EU) 2018/1725, you have the right to:

- access your personal data
- rectify inaccurate or incomplete data
- request erasure of your data
- request restriction of processing
- object to processing
- withdraw consent where processing is based on consent (if applicable)
- not be subject to automated decision-making

Requests can be addressed to: data-protection@sns-ju.eu

SNS JU will reply within one month, which may be extended in complex cases.

12. Complaints

If you consider that your rights have been infringed, you may contact the SNS JU DPO.

You also have the right to lodge a complaint with the European Data Protection Supervisor (EDPS):

European Data Protection Supervisor

Rue Wiertz 60

B-1047 Brussels

Email: edps@edps.europa.eu

13. Further information

The SNS JU public register of processing activities is available at:
<https://smart-networks.europa.eu/data-protection-declaration/>