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## PRIVACY STATEMENT

### Processing of personal data in the context of audit, control and anti-fraud activities

#### 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 audit, control and anti-fraud activities are handled fairly, lawfully and with due care, taking into account the sensitive nature of such processing.

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](mailto: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 purpose of ensuring sound financial management, legality and regularity of operations, and protection of the financial interests of the Union, including:

- planning and conducting internal and external audits
- performing ex-ante and ex-post controls
- detecting, preventing and investigating fraud, irregularities and suspected misconduct
- handling anti-fraud procedures and related follow-up actions
- reporting, monitoring and follow-up of audit findings and recommendations
- cooperation with EU institutions, bodies and agencies in audit and control activities

#### 4. Categories of data subjects

The processing may concern:

- SNS JU staff and management
- beneficiaries of grants and contractors
- external experts and evaluators
- representatives of participating organisations
- any individuals involved in audited or controlled activities

## 5. Personal data processed and legal basis

### Personal data processed

SNS JU may process the following categories of personal data:

- identification data (name, surname, function, organisation)
- contact details (email address, telephone number)
- professional and contractual data
- financial and transactional data
- audit and control-related data (findings, reports, assessments)
- information related to suspected irregularities or fraud
- in specific cases, data relating to conduct or potential offences.

### 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:

- Council Regulation (EU) 2021/2085 establishing SNS JU
- EU Financial Regulation and applicable implementing rules
- EU anti-fraud framework and internal control requirements

Where applicable, processing of data relating to offences is carried out in accordance with Article 11 of Regulation (EU) 2018/1725, subject to appropriate safeguards.

## 6. Source of the data

Personal data are:

- provided directly by data subjects
- collected during audits and control activities
- generated during investigations and reporting
- obtained from internal systems, beneficiaries, contractors or EU bodies

## 7. Recipients of the data

Access to personal data is granted on a need-to-know basis to: authorised SNS JU staff responsible for audit, control and anti-fraud functions

- internal audit functions and external auditors
- European Commission services
- European Court of Auditors (ECA)

- European Anti-Fraud Office (OLAF)
- other competent EU bodies or authorities

In specific cases, data may be shared with judicial or law enforcement authorities where required.

## **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 audit, control or investigation, or longer where required for legal or audit purposes

Retention periods may vary depending on the nature of the procedure and applicable legal requirements.

At the end of the retention period, data are securely deleted.

## **10. Security measures**

SNS JU implements appropriate technical and organisational measures, including:

- role-based access control
- secure storage and handling of sensitive information
- confidentiality obligations for staff and stakeholders
- monitoring and protection of IT systems

Enhanced safeguards are applied where sensitive data are processed.

## **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
- not be subject to automated decision-making

Requests can be addressed to: [data-protection@sns-ju.eu](mailto:data-protection@sns-ju.eu)

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

Restrictions to these rights may apply in accordance with Article 25 of Regulation (EU) 2018/1725.

## **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](mailto: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/>