



PRIVACY STATEMENT

Processing of personal data in the context of document and information management systems

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 document and information management systems 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 management of documents and information within SNS JU, including:

- registration, classification and storage of documents
- management of electronic document management systems (e.g. ARES or equivalent systems)
- handling of incoming and outgoing correspondence
- archiving and records management
- retrieval and consultation of documents
- ensuring traceability, integrity and availability of documents
- compliance with legal, administrative and audit requirements

4. Categories of data subjects

The processing concerns:

- SNS JU staff and management
- external correspondents (e.g. applicants, contractors, stakeholders)
- individuals mentioned in documents processed or stored by SNS JU

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, postal address, telephone number)
- content of documents and correspondence
- metadata associated with documents (e.g. author, date, reference number, registration data)
- administrative and procedural information

in specific cases, sensitive data included in documents where necessary

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 ensure proper document management and compliance with:

- Council Regulation (EU) 2021/2085 establishing SNS JU
- EU Financial Regulation and administrative requirements applicable rules on records management and transparency

Where applicable, processing of special categories of data is carried out in accordance with Articles 10 and 11 of Regulation (EU) 2018/1725.

6. Source of the data

Personal data are:

- provided directly by data subjects through correspondence or submissions
- generated internally by SNS JU staff
- obtained from other EU institutions, bodies or third parties

7. Recipients of the data

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

- authorised SNS JU staff
- European Commission services where relevant (e.g. shared systems such as ARES)
- contractors or service providers supporting document management systems, under appropriate safeguards
- audit, control or judicial 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 in accordance with applicable document retention and archiving rules, including:

- for the period necessary to fulfil administrative and operational purposes
- for longer periods where required by legal, audit or historical archiving obligations

Retention periods are defined in SNS JU records management policies.

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

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 restriction of processing
- object to processing

Certain rights may be restricted where necessary to ensure proper document management, archiving obligations or the protection of the rights of others, in accordance with Article 25 of Regulation (EU) 2018/1725.

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/>