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## PRIVACY STATEMENT

### Processing of personal data in the context of ethics, integrity and sensitive functions

#### 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 ethics, integrity and the management of sensitive functions are handled fairly, lawfully and with due care, taking into account the potentially 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 ensuring compliance with ethics, integrity and internal control requirements, including:

- prevention, identification and management of conflicts of interest
- submission and assessment of declarations of interests and confidentiality
- identification and management of sensitive functions
- implementation of ethics and integrity rules
- prevention and management of fraud and irregularities
- handling of anti-harassment procedures (where not covered by a dedicated procedure)

- monitoring, reporting and audit of ethics-related activities

#### 4. Categories of data subjects

The processing concerns:

- SNS JU staff and management
- external experts and evaluators
- members of governance bodies
- contractors and external stakeholders involved in SNS JU 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 financial interests
- declarations of interest and confidentiality
- information related to roles and responsibilities (including sensitive functions)
- information related to potential or actual conflicts of interest
- information related to conduct or alleged breaches of ethical rules
- in specific cases, sensitive data where strictly 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 compliance with:

- EU Staff Regulations and Conditions of Employment of Other Servants (CEOS)
- Council Regulation (EU) 2021/2085 establishing SNS JU
- EU Financial Regulation and related anti-fraud and internal control requirements
- applicable internal rules and policies on ethics, integrity and conflict of interest

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

#### 6. Source of the data

Personal data are:

- provided directly by data subjects (e.g. declarations of interest, confidentiality statements)
- generated during administrative and control processes
- obtained from internal or external sources where necessary for verification

#### 7. Recipients of the data

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

- authorised SNS JU staff responsible for ethics, HR, legal or internal control functions
- management and decision-making bodies where relevant
- the SNS JU Data Protection Officer (for data protection-related matters)
- European Commission services or other EU bodies where required
- audit, control or investigative authorities

Data are not disclosed to the public unless required by law or transparency obligations.

## **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 after the end of the relevant function or activity, or longer where required for audit or legal purposes

Retention periods may vary depending on the nature of the processing (e.g. declarations, investigations, control activities).

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 restriction of processing
- object to processing

Certain rights may be restricted where necessary to safeguard investigations, internal control activities, confidentiality obligations or the rights of others, in accordance with Article 25 of Regulation (EU) 2018/1725.

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.

## **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/>