



European Research Council
Executive Agency

Established by the European Commission

RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (henceforth the "Data Protection Regulation")

Record n°

DPO 19-2020

In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.

This record covers two aspects:

1. Mandatory records under Art 31 of the data protection regulation (recommendation: make the header and part 1 publicly available)
2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)

The ground for the record is (tick the relevant one):

- Regularization of a data processing operation already carried out
- Record of a new data processing operation prior to its implementation
- Change of a data processing operation.
Migration from notification to record.

ERCEA Surveys and polls

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1	Last update of this record if applicable	Last notification of processing operation Ares(2020)5935102 of 26/10/2020
2	Short description of the processing	The ERCEA launches surveys, poll or questionnaires for various purposes, such as: <ul style="list-style-type: none"> • Discovering or confirming ways to improve the working environment and/or a work process; • Collecting stakeholder opinions regarding ERC related matters, (e.g. events, policy, etc.); • Raising awareness (e.g. about ethics issues or fraud);

		<ul style="list-style-type: none"> Organising European Research Council events (e.g. conferences, workshops); Assessing the interest to change ERC processes (e.g. introducing PI interviews in the second step of the Advanced Grant evaluation); Exploring opportunities for commercial exploitation or societal valorisation of ERC frontier research. <p>When submitting the survey, certain personal data may be collected: name, surname, organisation, responses, date of completion and modification (if applicable) of the questionnaire, among others. Responses vary depending on the topic of the survey. The collection and aggregation of these data lead to their subsequent analysis.</p> <p>Surveys are built on SharePoint, commissioned via EUSurvey, PollUnit or created as a poll in Microsoft Outlook.</p> <p>Survey owners (i.e. the Units launching the survey) determine if the survey must be fully anonymous. For SharePoint surveys, the process of anonymization is carry out manually by the survey owners.</p> <p>For PollUnit poll, participants may be prevented from multiple voting with the help of cookie and IP checks.</p>
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Part 1 - Article 31 Record

3	Function and contact details of the controller	ERCEA Director ERC-SURVEYS@ec.europa.eu ERC-WEBMASTER@ec.europa.eu
4	Contact details of the Data Protection Officer (DPO)	ERC-DATA-PROTECTION@ec.europa.eu
5	Name and contact details of joint controller (where applicable)	N/A
6	Name and contact details of processor (where applicable)	Directorate-General for Informatics (DG DIGIT) DIGIT-EUSURVEY-SUPPORT@ec.europa.eu PollUnit UG (haftungsbeschränkt) Conrad-Schulz-Weg 3 D-82211 Herrsching support@pollunit.com
7	Purpose of the processing	Surveys, poll or questionnaires serve to collect and aggregate data, which in turn leads to their analysis. Survey owners determine the specific purpose of the survey when designing it. The DPO verifies whether the purpose and the collected data is appropriate. The processing of personal data is also required to ensure that participants cannot submit answers more than once

		and, when needed to allow filtering out non-ERCEA staff who may have submitted answers.
8	<p>Description of the categories of data subjects</p>	<p>Below are examples of data subjects surveyed in the past. A survey generally addresses a single data subject category.</p> <p><input checked="" type="checkbox"/> EA staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the EA</p> <p><input type="checkbox"/> Contractors providing goods or services to the Agency</p> <p><input checked="" type="checkbox"/> Applicants</p> <p><input type="checkbox"/> Relatives of the data subject</p> <p><input type="checkbox"/> Complainants, correspondents and enquirers</p> <p><input type="checkbox"/> Witnesses</p> <p><input checked="" type="checkbox"/> Beneficiaries</p> <p><input checked="" type="checkbox"/> Independent experts</p> <p><input checked="" type="checkbox"/> Principal investigators (PI)</p> <p><input checked="" type="checkbox"/> Other Scientific staff</p> <p><input type="checkbox"/> Subcontractors</p> <p><input checked="" type="checkbox"/> Other, please specify: ERC stakeholders</p>
9	<p>Description of personal data categories</p> <p>Indicate all the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</p>	<p><i>Categories of personal data:</i> These are the categories collected in some past surveys. Surveys can be anonymous and do not request any personal data.</p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input checked="" type="checkbox"/> concerning the data subject's private sphere</p> <p>[E.g. information on how colleagues are coping with a specific situation].</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input checked="" type="checkbox"/> concerning recruitment and contracts</p> <p>[Internal organisation (agency/unit) External Principal Investigators, Host Institutions].</p> <p><input checked="" type="checkbox"/> concerning the data subject's family</p> <p>[For instance, the number of family members].</p> <p><input checked="" type="checkbox"/> concerning the data subject's career</p>

		<p>[E.g. information related to training activities, internal events and also information linked to beneficiaries, National Contact Point (NCP) and PIs].</p> <p>X concerning leave and absences</p> <p>[Work patterns].</p> <p><input type="checkbox"/> concerning missions and journeys</p> <p>X concerning social security and pensions</p> <p>[Satisfaction surveys on the rights and benefits of staff members].</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input type="checkbox"/> concerning telephone numbers and communications</p> <p>X concerning names and addresses (including email addresses)</p> <p>[Name, surname, professional email address].</p> <p><input type="checkbox"/> Other :please specify : see examples below</p> <p><i>Categories of personal data processing likely to present specific risks:</i></p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</p> <p><input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p><i>Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):</i></p> <p><input type="checkbox"/> revealing racial or ethnic origin</p> <p><input type="checkbox"/> revealing political opinions</p> <p><input type="checkbox"/> revealing religious or philosophical beliefs</p> <p><input type="checkbox"/> revealing trade-union membership</p> <p><input type="checkbox"/> concerning health</p> <p><input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person</p> <p><input type="checkbox"/> concerning sex life or sexual orientation</p> <p><i>Specify any additional data or explanatory information on the data being processed, if any:</i></p> <p>The date of completion and modification (if applicable) are also gathered.</p> <p>The topics on which opinions/responses are requested vary from survey to survey, as does the form and format of the survey, therefore the personal data collected.</p>
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10	Retention time (time limit for keeping the personal data)	<p>Survey owners specify the retention times in the data protection notice distributed with their survey.</p> <p>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?</p> <p><input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>The ERCEA may envisage anonymous statistical analyses. However, the retention periods mentioned above will not be increased.</p>
11	Recipients of the data	<p>The persons with access to the personal data, on a need-to-know basis are:</p> <ul style="list-style-type: none"> - The authorised ERCEA personnel in charge of creating and launching the survey; - The European Commission and other Agencies in case of joint surveys; - Authorised staff members in the IT Unit (D.1) and DG DIGIT in charge of developing, hosting and maintaining the system; - Members of the Scientific Council (ScC); - Staff of PollUnit.
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	Not applicable.
13	<u>General</u> description of the technical and organisational security measures	<p>The Agency procedure states that the IT Unit creates the survey on behalf of the survey owners. The creator of the survey can export and send the results to the survey owners.</p> <p>Communication Unit creates the polls, the administrator of the poll can check and export the results. Therefore all users who have access to the administration of a survey have the option to export, edit and save the results, votes, and e-mail addresses (if known) of the participants.</p>
14	Information to data subjects/Data Protection Notice (DPN)	<p>The information on the processing of personal data is made available to the data subjects. Each individual survey is accompanied by its own DPN.</p> <p>For the Privacy Statement of EUSurvey, data subjects may refer to:</p> <p>https://ec.europa.eu/eusurvey/home/privacystatement</p> <p>For the Privacy Statement of PollUnit, data subjects may refer to: https://pollunit.com/en/privacy</p>