



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 63 - 2025

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.

Transparency Register

1	Last update of this record if applicable	N/A
2	Short description of the processing	<p>Meetings of ERCEA managers with interest representatives must comply with transparency requirements outlined in Commission Decisions (EU) 2024/3081 and 2024/3082. External participants self-register in the transparency register, and the ERCEA publishes meeting information.</p> <p>Minutes are published via the ATMOS IT tool, including: names and functions of participating ERCEA managers, and EUIBA¹ staff with managerial or equivalent positions, if</p>

¹ 'EUIBA' meaning European Union Institutions, Bodies and Agencies, thereby encapsulating all EU-related operating entities.

		<p>applicable, names of the ERCEA and EUIBA staff who have explicitly consented to disclosure of their personal data, if applicable, the name of the interest representative organisation, and discussion content and conclusions. Meeting information is processed in ATMOS and published on the ERCEA webpage and in the Transparency Register profile of the interest representative. The Commission also provides downloadable datasets of ERCEA meetings on data.europa.eu in XML/Excel format.</p> <p>In addition, personal data of ERCEA staff (names, service, user logs) is processed in ATMOS for the purpose of using the IT system and personal data of Commission staff (names, service, user logs) is processed in ATMOS for the purpose of managing the functioning of the IT system, in both cases the Commission is separated controller.</p>
Part 1 - Article 31 Record		
3	Function and contact details of the controller	ERCEA Director ERC-INFO@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)	N/A.
7	Purpose of the processing	<p>The purpose of the processing is to make public certain information on meetings held by ERCEA managers (Director, Heads of Department, Heads of Unit) with interest representatives (organisations or self-employed individuals) on issues relating to decision-making and policy implementation at the ERCEA.</p> <p>Personal data of ERCEA staff (names, service, user logs) is processed in ATMOS for the purpose of using the IT system and personal data of Commission staff (names, service, user logs) is processed in ATMOS for the purpose of managing the functioning of the IT system, in both cases the Commission is separated controller.</p> <p>Further processing is foreseen for archiving in the public interest and statistical purposes.</p>
8	Description of the categories of data subjects	<p>Whose personal data are being processed? In case data categories differ between different categories of persons, please explain as well (e.g. suspects vs. witnesses in administrative inquiries)</p> <p><input checked="" type="checkbox"/> EA staff (Contractual and temporary staff in active position [ERCEA staff encoding information in ATMOS, ERCEA staff holding management positions, ERCEA staff participating in the meetings who have explicitly consented</p>

		<p>to disclosure of their personal data]</p> <p><input type="checkbox"/> Visitors to the EA</p> <p><input type="checkbox"/> Contractors providing goods or services</p> <p><input 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 type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p> <p><input checked="" type="checkbox"/> Other: [interest representatives (natural persons)]</p> <p>[EUIBA staff in active position at managerial or equivalent level who participate in the meetings, and EUIBA staff participating in the meetings who have explicitly consented to disclosure of their personal data, if applicable), if applicable]</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>Categories of personal data:</p> <p><input checked="" type="checkbox"/> in the form of personal identification numbers</p> <p>[user login of the ERCEA staff encoding information in ATMOS]</p> <p><input type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints</p> <p><input type="checkbox"/> concerning the data subject's private sphere</p> <p><input type="checkbox"/> concerning pay, allowances and bank accounts</p> <p><input type="checkbox"/> concerning recruitment and contracts</p> <p><input type="checkbox"/> concerning the data subject's family</p> <p><input checked="" type="checkbox"/> concerning the data subject's career</p> <p>[service of the ERCEA staff encoding information in ATMOS]</p> <p><input type="checkbox"/> concerning leave and absences</p> <p><input type="checkbox"/> concerning missions and journeys</p> <p><input type="checkbox"/> concerning social security and pensions</p> <p><input type="checkbox"/> concerning expenses and medical benefits</p> <p><input type="checkbox"/> concerning telephone numbers and communications</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p>

		<p>[name(s) of the ERCEA manager(s), and EUIBA staff at managerial or equivalent level, if applicable, participating in a meeting; name(s) of the ERCEA staff and EUIBA staff, if applicable, participating in a meeting who have explicitly consented to data processing; name(s) of the self-employed individuals (as registered in the transparency register); name(s) and email(s) of the ERCEA staff encoding information in ATMOS]</p> <p><input checked="" type="checkbox"/> Other:</p> <p>[date, location and subject of the meeting]</p> <p>[date and time of actions performed in ATMOS by the ERCEA staff encoding information in ATMOS]</p> <p>Categories of personal data processing likely to present specific risks:</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>Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):</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>Specify any additional data or explanatory information on the data being processed, if any:</p> <p>N/A</p>
10	Retention time (time limit for keeping the personal data)	<p>Personal data of the meeting participants (ERCEA and EUIBA staff, where applicable, holding managerial or equivalent position, ERCEA and EUIBA staff participating in the meetings who have explicitly consented to disclosure of their personal data, and, where applicable, interest representatives) is retained for five-year periods, starting from the date the College of Commissioner's begins its mandate.</p> <p>Personal data of the ERCEA staff encoding information in ATMOS is retained for 5 years as of the date of the last logged action, unless a longer retention period is necessary due to a legal or administrative procedure.</p> <p>Is any further processing for archiving purposes in the</p>

		<p>public interest, historical, statistical or scientific purposes envisaged?</p> <p><input checked="" type="checkbox"/> yes <input type="checkbox"/> no</p> <p>Following the lapse of the applicable retention period, the Europa webpages are digitally archived for permanent preservation, in line with the Commission Europa Web Guide.</p>
11	Recipients of the data	<p>Only Commission IT staff managing the functioning of the IT system and the ERCEA staff responsible for the encoding of meetings will have access to the personal data.</p> <p>The lists of meetings held by ERCEA managers with interest representatives are published online and are therefore available to the general public.</p>
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>Personal data published on a publicly available website (such as europa.eu) are accessible worldwide.</p>
13	<u>General</u> description of the technical and organisational security measures	<p>All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission.</p> <p>All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>In order to protect personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.</p>
14	Information to data subjects/Specific Privacy Statement (SPS)	<p>The data protection notice is published on the ERCEA intranet.</p>