

**PRIME Meeting 15**  
**18 November 2019, Brussels**

**Item 8.7 - Information points:**  
**Information on use of personal data in the framework of PRIME**

*From: EC*

***– For Information –***

**1. BACKGROUND**

The European Commission collects personal data from PRIME members in line with the privacy notices contained in Annex I and II to this document.

Essentially, the Commission collects personal data for the PRIME website members' area and the PRIME KPI tool for

- authorisation of the users in order to grant (or not) to them access to these sites;
- for generating contact information (name, e-mail address and organisation) necessary for the exchange of information among the participants.

Data are visible to:

- staff or contractors responsible for carrying out website and tool management
- for the users having been authorised to use the PRIME members' area or KPI tool.

No third party cookies or any tracking tools are used by either site.

Details are provided in the standard format privacy statements in the annexes.

**2. EXPECTED CONTRIBUTION BY INFRASTRUCTURE MANAGERS**

DG MOVE will send out the existing contact list to members for updates in the coming weeks.

For further information, contact [MOVE-PRIME@ec.europa.eu](mailto:MOVE-PRIME@ec.europa.eu).

## ANNEX I

# PRIME WEBSITE MEMBERS' AREA PRIVACY NOTICE

### **1. Introduction**

The European institutions are committed to protecting and respecting your privacy. The personal data collected and processed by PRIME Website Members' Area is governed by Regulation (EU) 2018/1725 of the European Parliament and of the Council 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.

This privacy notice explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your personal data.

This statement concerns PRIME website Members' Area, managed by Unit C.3. Single European rail area of DG Transport and Mobility (DG MOVE).

PRIME website Members' Area is designed to support the activities of the European Network of Infrastructure Managers (PRIME) as provided for in Article 7f of Directive 2012/34/EU<sup>1</sup>. It includes:

1. PRIME website public area;
2. PRIME Members' Area with restricted access to the representatives of PRIME member organisations and observers;

PRIME member organisations are rail infrastructure managers, allocation and charging bodies from EU Member States/ EFTA States, and the European Commission. The European Union Agency for Railways and the industry associations of European rail infrastructure managers (CER, EIM, RNE and VDV) participate as observers.

Personal data are collected only for PRIME Members' Area.

The Data Controller are appointed employees of the DG MOVE C.3. who are represented by the Head of Unit of DG MOVE C.3 Single European rail area.

### **2. Why do we process your data?**

The purpose of collecting and processing personal data is:

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<sup>1</sup> Directive 2012/34/EU<sup>1</sup> establishing a single European railway area, as amended by Directive (EU) 2016/2370.

- a) for authorisation of the users in order to grant (or not) to them the access to PRIME Website Members' Area;
- b) for generating contact information (name, e-mail address and organisation) necessary for the exchange of information among PRIME members and managing meeting registrations.

Data is collected directly from the users through registration forms using secure HTTPS connection. Once your profile is activated, access to it is done through the EU Login<sup>2</sup> *authentication*, identifying you as one of the authorised users.

Changes to personal data following registration are allowed, as follows:

- Changes with no effect on the authorization (e.g. position.) are allowed and available to the end-user. You can verify your account information in PRIME Members' Area on the landing page under "My Account".
- Changes that would affect the *authorization* in PRIME Website Members' Area (e.g. affiliation to a particular Organisation) are allowed based on a request submitted via website contact form (<https://webgate.ec.europa.eu/multisite/primeinfrastructure/contact>) or by sending an email to MOVE PRIME [MOVE-PRIME@ec.europa.eu](mailto:MOVE-PRIME@ec.europa.eu).

### **3. On what legal ground(s) do we process your personal data?**

We process your personal data, because it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

PRIME website Members' Area is designed to support the activities of the European Network of Infrastructure Managers (PRIME) as provided for in Article 7f of Directive 2012/34/EU.

### **4. Which data do we collect and process?**

For *authentication* the following users first need to have EU-Login account. Privacy statement of EU Login can be accessed [here](#).

For *authorisation* (i.e. creating the user account which gives access to the PRIME Members' Area), it is necessary to *register* by filling in a form with the following compulsory information:

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<sup>2</sup> EU Login was formerly known as the European Commission Authentication Service system – ECAS.

- Email
- First Name
- Last Name
- Organisation
- Position.

All this data is, in addition, processed for generating contact information necessary for the exchange of information among PRIME members.

#### **5. Who has access to your data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff, including external contractor responsible for content management, according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

No third party cookies or any tracking tools are used by the site.

The access of other participants to your personal data depends on the type of your account as follows:

- For the users having requested access by filling in registration form – you data is visible to the Data Controller and authorised staff for the purpose of validating (or not) the access to PRIME Members’ Area, site administration purposes and potentially for communication purposes.
- For the users having been authorised to use PRIME Members’ Area - your data will be visible, in the form of contact lists, in addition to the Data Controller and authorised staff also to other authorised users of PRIME Members’ Area.

#### **6. How do we protect your data?**

In order to protect your 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.

Authorized access to personal data has been ensured through the implementation, at the application level, of a strict authentication (i.e. identifying the user as registered in PRIME Website Members’ Area) and authorization policy (i.e. granting different access rights to

different parts of the PRIME Website Members' Area, depending on the role of the User). The authentication process is done through the "EU Login" system.

When you login, the password is always encrypted on the network and is decrypted for checking against the stored password by the authentication service, not by the individual site. All passwords (including previous passwords mentioned above) are stored in a form that permits them to be checked against a supplied value, but their actual value cannot be derived from the stored value.

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored on the servers of the European Commission. All processing operations are carried out pursuant to Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

## **7. How long do we keep your data?**

DG MOVE C.3 keeps the personal data for the entire operational time of PRIME Website Members' Area, unless:

1. the user specifically requests deactivation and deletion of the profile;
2. the user's Organisation specifically requests deactivation and deletion of the user's profile; or deletion of the Organisation Account and of all related user profiles;
3. there is evidence that e-mail linked to the user profile is not any more in use;
4. any inappropriate use of PRIME Website Members' Area is detected by the Data Controller or authorised staff.

## **8. What are your rights and how can you exercise them?**

According to Regulation (EU) 2018/1725,<sup>3</sup> you are entitled to access your personal data and rectify and/or block it in case the data is inaccurate or incomplete. You can also request

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<sup>3</sup> In particular, the processing respects the following rights of data subjects as provided for in this Regulation:

- Article 17 - Right of access by the data subject
- Article 18 - Right to rectification
- Article 19 - Right to erasure (right to be forgotten)

information about whether and how your data has been processed. You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer and if necessary the European Data Protection Supervisor using the contact information given at point 9 below.

## **9. Contact information**

If you have comments or questions, any concerns or complaints regarding the collection and use of your personal data, please feel free to contact the Data Controllers or the Data Protection Officer (DPO) using the following contact information:

The Data Controllers:

- *Directorate Mobility and Transport – MOVE.C.3 Head of Unit MOVE-PRIME@ec.europa.eu*

Remarks can be addressed to the Commission Data Protection Officer (DPO):

- *DATA-PROTECTION-OFFICER@ec.europa.eu*

Complaints can be addressed to the European Data Protection Supervisor (EDPS):

- *edps@edps.europa.eu.*

## **10. Where to find more detailed information?**

The Commission Data Protection Officer publishes the register of all operations processing personal data. You can access the register on the following link: <http://ec.europa.eu/dpo-register>

This specific processing has been notified to the DPO with the following reference:  
DPR-EC-02032.1

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- Article 20 - Right to restriction of processing
  - Article 21 - Notification obligation regarding rectification or erasure of personal data or restriction of processing
  - Article 22 - Right to data portability
  - Article 23 - Right to object
  - Article 24 - Rights related to Automated individual decision making, including profiling

## ANNEX II

# PRIME KPI WEB-TOOL

## PRIVACY NOTICE

### **11. Introduction**

The European institutions are committed to protecting and respecting your privacy. The personal data collected and processed by PRIME KPI Web Tool is governed by Regulation (EU) 2018/1725 of the European Parliament and of the Council 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.

This privacy notice explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your personal data.

This statement concerns PRIME KPI Web Tool, managed by Unit C.3. Single European rail area of DG Transport and Mobility (DG MOVE).

PRIME KPI Web Tool is designed to support the activities of the European Network of Infrastructure Managers (PRIME) as provided for in Article 7f (d) of Directive 2012/34/EU<sup>4</sup>.

Access to PRIME KPI Web Tool is restricted to the representatives of reporting organisations and authorised observers.

**The Data Controllers** is the Head of Unit of DG MOVE C.3 Single European rail area.

### **12. Why do we process your data?**

The purpose of collecting and processing personal data is:

- c) for authorisation of the users in order to grant (or not) to them the access to PRIME KPI Web Tool;
- d) for generating contact information (name, e-mail address and organisation) necessary for the exchange of information among the users of the Tool.

Data is collected directly from the users through registration form using secure HTTPS connection. Once your profile is activated, access to it is done through the EU Login<sup>5</sup> *authentication*, identifying you as one of the authorised users.

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<sup>4</sup> Directive 2012/34/EU<sup>4</sup> establishing a single European railway area, as amended by Directive (EU) 2016/2370.

Changes to personal data following registration are allowed based on a request submitted via a contact email to the database administrator as provided in the land page.

**13. On what legal ground(s) do we process your personal data?**

We process your personal data, because it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

PRIME KPI Web-Tool is designed to support the activities of the European Network of Infrastructure Managers (PRIME) as provided for in Article 7f(d) of Directive 2012/34/EU.

**14. Which data do we collect and process?**

For *authentication* the following users first need to have EU-Login account. Privacy statement of EU Login can be accessed [here](#).

For *authorisation* (i.e. creating the user account which gives access to the PRIME KPI Web Tool), it is necessary to *register* by filling in a form with the following compulsory information:

- Email
- First Name
- Last Name
- Country
- Organisation
- User role.

All this data is, in addition, processed for generating contact information necessary for the exchange of information among the users of PRIME KPI Web-tool and the database administrator.

**15. Who has access to your data and to whom is it disclosed?**

By registering yourself, you authorise the disclosure of the details you have entered in the user registration system to the Commission staff responsible for carrying out this processing operation and to authorised staff of the contractor acting as database administrator, according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

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<sup>5</sup> EU Login was formerly known as the European Commission Authentication Service system – ECAS.



No cookies or any third party tracking tools are used by the tool. The access of other participants to your personal data depends on the type of your account as follows:

- For the users having requested access by filling in registration form – your data is visible to the Data Controller and authorised staff for the purpose of validating (or not) the access to PRIME KPI Web Tool, tool and database administration purposes and potentially for communication purposes.
- For the users having been authorised to use PRIME KPI Web Tool - your data could be visible in addition to the Data Controller and authorised staff also to all other authorised users of PRIME KPI Web Tool.

## **16. How do we protect your data?**

In order to protect your 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.

Authorized access to personal data has been ensured through the implementation, at the application level, of a strict authentication (i.e. identifying the user as registered in PRIME KPI Web-Tool) and authorization policy (i.e. granting different access rights to different parts of the PRIME KPI Web-Tool, depending on the role of the User). The authentication process is done through the “EU Login” system.

When you login, the password is always encrypted on the network and is decrypted for checking against the stored password by the authentication service, not by the individual site. All passwords (including previous passwords mentioned above) are stored in a form that permits them to be checked against a supplied value, but their actual value cannot be derived from the stored value.

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored on the servers of the European Commission. All processing operations are carried out pursuant to Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission’s contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States (‘GDPR’ Regulation (EU) 2016/679).

### **17. How long do we keep your data?**

System and database administrators will keep the personal data for the entire operational time of PRIME KPI Web Tool, unless:

5. the user specifically requests deactivation and deletion of the profile;
6. the user's Organisation specifically requests deactivation and deletion of the user's profile; or deletion of the Organisation Account and of all related user profiles;
7. there is evidence that e-mail linked to the user profile is not any more in use;
8. any inappropriate use of PRIME KPI Web Tool is detected by the Data Controller or authorised staff.

### **18. What are your rights and how can you exercise them?**

According to Regulation (EU) 2018/1725,<sup>6</sup> you are entitled to access your personal data and rectify and/or block it in case the data is inaccurate or incomplete. You can also request information about whether and how your data has been processed. You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer and if necessary the European Data Protection Supervisor using the contact information given at point 9 below.

### **19. Contact information**

If you have comments or questions, any concerns or complaints regarding the collection and use of your personal data, please feel free to contact the Data Controllers or the Data Protection Officer (DPO) using the following contact information:

The Data Controller:

- *Directorate Mobility and Transport – MOVE.C.3, Head of UnitMOVE-*

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<sup>6</sup> In particular, the processing respects the following rights of data subjects as provided for in this Regulation:

- Article 17 - Right of access by the data subject
- Article 18 - Right to rectification
- Article 19 - Right to erasure (right to be forgotten)
- Article 20 - Right to restriction of processing
- Article 21 - Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Article 22 - Right to data portability
- Article 23 - Right to object
- Article 24 - Rights related to Automated individual decision making, including profiling

*PRIME@ec.europa.eu*

Remarks can be addressed to the Commission Data Protection Officer (DPO):

- *DATA-PROTECTION-OFFICER@ec.europa.eu*

Complaints can be addressed to the European Data Protection Supervisor (EDPS):

- *edps@edps.europa.eu.*

## **20. Where to find more detailed information?**

The Commission Data Protection Officer publishes the register of all operations processing personal data. You can access the register on the following link: <http://ec.europa.eu/dpo-register>

This specific processing has been notified to the DPO with the following reference:  
DPO-DPR-EC-02033.1