



DEPARTMENT FOR COMMUNICATIONS (DCM)

Privacy Statement on Requests for public access to documents

All personal data are processed in accordance with the provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regards to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

Identity of the controller:

The controller is Cedefop and the responsible department is Department for Communications (DCM).

Identity of the processors:

- DCM – Info service
- Designated Cedefop staff (when request involves documents handled by them)
- Cedefop's Legal Function (when request involves a legal matter)

Purpose of the processing:

Processing of personal data is necessary for handling document access requests received by Cedefop and for providing access to the requested documents to the requester in accordance with [Regulation \(EC\) No 1049/2001](#).

This right to access concerns documents held by Cedefop, ie. documents drawn up or received by it and in its possession.

Cedefop strives to provide the public with the widest possible access to documents held by it through its website. If citizens cannot find a document on Cedefop's website, they can use the following document request form to request access to it: [Requests for access to documents](#) (Cedefop web portal).

Description of the processing:

The document request form in the Cedefop web portal simply sends an email to info@cedefop.europa.eu (it does not store data anywhere). Requesters can also send their written requests directly to the following email address: info@cedefop.europa.eu

DCM receives the requests for public access to documents. Requests are logged, an acknowledgement of receipt is sent, and DCM forwards the request to the appropriate department, service and/or staff member.

When a request is for a document which is publicly available, DCM normally replies directly to the requester.

When a request affects a legal matter or case, the request is forwarded to Cedefop's Legal Function who either replies directly to the requester or provides the answer to DCM to be sent out.

If a request is received directly by the Legal Function or members of the Director's office and affects a legal matter, it is assessed, logged and responded to directly by the Legal Function. Otherwise, it is forwarded to DCM to be processed.

Cedefop implements appropriate technical and organisational measures to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them.

Data subjects (categories of persons whose data is processed):

- Requesters: citizens of the European Union and natural or legal persons residing or having their registered office in an EU Member State;
- Authors of documents requested (when their personal data appears on the documents requested)
- Individuals mentioned or cited in the requested documents

Data processed:

- Requester's data: document(s) requested, description (file number, comments, etc.), last name, first name, organisation, email address and country
- Authors of and/or individuals mentioned or cited in the requested document: categories of data depend on the document requested, but generally includes name and/or contact details. DPO is consulted when disclosure of document could affect privacy of third parties.

Legal basis / lawfulness:

The lawfulness of the processing is defined by **Article 5(1)(a) of Regulation 2018/1725**, namely the processing 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.

Processing necessary also for compliance with [Regulation \(EC\) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents](#);

The retention period of the collected personal data:

The file (including the request, the response, any related correspondence and all supporting documentation) will be stored in Cedefop's records bank for two years after the closure of the case, or as long as Cedefop is under a legal obligation to do so.

Recipients of the data:

- Records manager and/or designated records bank correspondent (only receives identification of documents requested);
- Data Protection officer (receives only documents requested when they include personal data of third parties);
- When necessary, access to the personal data may be granted also to internal or external authorized staff in public authorities or audit control or investigation bodies such as: Cedefop Internal Control, external legal contractor, external audit contractors, Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF), European Ombudsman, the European Data Protection Supervisor, the General Court or the European Court of Justice.

Data subject's rights:

Data subjects have the right to access and rectify (under specific circumstances) their information and request their erasure.

Queries and concerns regarding the processing of your personal data may be addressed to Cedefop's DCM Info at the following email: info@cedefop.europa.eu. You can also contact Cedefop's Data Protection Officer at the following email: data-protection-officer@cedefop.europa.eu

Data subjects are also entitled to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu/>

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