



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR COMMUNICATIONS NETWORKS, CONTENT AND
TECHNOLOGY

Connectivity
Radio Spectrum Policy
Radio Spectrum Policy Group Secretariat

PROTECTION OF YOUR PERSONAL DATA

**This privacy statement provides information about
the processing and the protection of your personal data.**

**Processing operation: Public consultation on draft Radio Spectrum Policy Group (RSPG)
opinions and reports**

Data Controller: European Commission, *unit B.4, Directorate Connectivity DG CNECT*

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1. Introduction

The European Commission is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [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 statement explains the reason for the processing of your personal data in the context of any submissions you may make in relation to an RSPG Public consultation. It explains the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

2. Why and how do we process your personal data?

Purpose of the processing operation: Unit B.4 of the DG CNECT collects and further processes your personal data to maintain a record of any submission you have made in response to a call for comments as part of a public consultation. Any comments you submit will be shared in the first instance with members of the RSPG (see: <https://rspg-spectrum.eu/rspg-members-and-observers/>).

At a later stage, when the RSPG have finalised and adopted the text upon which they have made the public consultation, the normal procedure is to publish the final text and any comments made by interested parties (in response to the public consultation) on the earlier draft version of the document. The RSPG Rules of Procedure provide however that a contributor may request confidentiality (see section 3 below) in which case their contribution will only be shared with RSPG members and not published.

The processing of your personal data therefore includes two main elements:

- The processing of any personal data you may provide when submitting comments (e.g. personal contact details)

Your personal data will not be used for any automated decision-making including profiling.

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

The processing operations on personal data, linked to the publication of any comments received in response to an RSPG public consultation are necessary for compliance with Article 23 of the [RSPG Rules of Procedure](#) which state that:

“In line with Article 6 of the RSPG Decision, the Group shall, whenever appropriate, publish draft reports and opinions for public consultation to assist it in its work. Comments received in response to consultation documents shall as a rule be published, unless contributors have requested confidentiality in line with Regulation 1049/2001, in which case they shall be accessible by the members only”.

Consequently, those processing operations are lawful under Article 5(1)(a) of Regulation (EU) 2018/1725 (processing is necessary for the performance of a task carried out in the public interest).

Your consent is required for the publication of any personal data e.g. in the form of name, address etc that may have been provided by you as part of your submission to the Public Consultation. Please note that parties submitting a response to the public consultation have the option to submit a response for publication which contains no personal data (and which only, indicates, for example, the organisation that the contributor represents).

If you make a contribution in response to an RSPG public consultation you are considered to be giving your explicit consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to the processing of your personal data for the specific purposes outlined in section 2 above.

The provision of such consent does not affect your right to request that your contribution is treated as confidential in line with the provisions of Article 23 of the RSPG Rules of Procedure.

Your consent for these services can be withdrawn at any time. For withdrawing consent that you have provided, please contact the controller at cnect-rspg@ec.europa.eu.

4. Which personal data do we collect and further process?

The following personal data may be processed:

- contact details (function/title, first name, last name, name of organisation, city, country, e-mail address, telephone number);

5. How long do we keep your personal data?

While the Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, you should note that any personal data contained in your submission which is subsequently published on the RSPG website, will in principle remain there indefinitely.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the European Commission or of its contractors. 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 the confidentiality obligations deriving from the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)). The contract also specifies that the contractors also implement technical and organisational measures to ensure an adequate level of data protection in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

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.

7. Who has access to your personal data and to whom is it disclosed?

Unless you request your contribution to be treated as confidential, any personal data you include in your submission to the public consultation will be published on the RSPG website.

Such personal data may also be provided to the Commission staff responsible for carrying out the processing operation and to other authorised Commission staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality requirements.

In the event that you have requested confidentiality, access to your personal data will be restricted to authorised Commission staff.

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

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

If you provide your consent to the processing and/or publication of your personal data to the data controller for the present processing operation, you can withdraw your consent at any time by notifying the data controller. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the data controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, Unit B.4 (cnect-rspg@ec.europa.eu).

- **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the data controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the European Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.