EUROPEAN COMMISSION

PRIVACY STATEMENT FOR TARGETED CONSULTATION ACTIVITIES ORGANISED BY THE EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

Processing operation: *Targeted consultation activities for a study on equal treatment in housing in the European Union*

Controller: *European Commission, Directorate-General for Justice and Consumers, Unit D1*

Record reference: *DPR-EC-01011*

Table of Contents

1. **Introduction**
2. **Why and how do we process your personal data?**
3. **On what legal ground(s) do we process your personal data?**
4. **Which personal data do we collect and further process?**
5. **How long do we keep your personal data?**
6. **How do we protect and safeguard your personal data?**
7. **Who has access to your personal data and to whom is it disclosed?**
8. **What are your rights and how can you exercise them?**
9. **Contact information**
10. **Where to find more detailed information?**

1. Introduction

The European Commission (hereafter 'the 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 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, 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.

The information in relation to the processing of personal data linked to targeted consultation activities organised by the services of the Commission is presented below.

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

Purpose of the processing operation:

The Commission collects and uses your personal information within the framework of targeted consultation activities to obtain your views on a specific initiative. The initiative is the European Commission study on equal treatment in housing in the EU. The study and data collected will aim to improve the understanding of inequality and discrimination for specific groups at higher risk of discrimination (based on sex, gender identity, age, disability status, racial or ethnic origin, religion or belief, sexual orientation) in housing across the EU, focusing on equal access, affordability, adequacy, and segregation/exclusion and homelessness.

The objective of the targeted consultations is to collect data on individual experiences within equal access to housing, affordability, adequacy, segregation/exclusion and/or homelessness.

Within the scope of the targeted consultations:

1. You will be invited to a focus group to discuss your individual experience in housing with a focus on equal access to housing, affordability, adequacy, segregation/exclusion and/or homelessness.
2. Following the focus group, you may be selected to take part in a targeted in-depth online interview to provide more insight in the experiences you shared, only if you provide your separate and explicit consent to take part.
3. A testimonial (short narrative) based on the information you provided during the focus group and the in-depth online interview (if you agree to take part and are selected) will be published with identifiable information, only with your separate and explicit consent.

You are being contacted by the service of the Commission since it has concluded that your views are relevant and necessary to inform the specific study concerned by the targeted consultation.

The study will be conducted by the data processor ICF S.A.

For reasons of transparency and openness your views will, in principle, be published on a Europa website, in the form of a summary report. The Commission only publishes your identity if you consent to the publication.

To avoid misuse, anonymous contributions to the Commission may not be accepted, regardless of whether you consent to the publication of your identity together with your contribution.

- In the context of the targeted consultation, with your consent, the focus group and in-depth online interview will be audio recorded for accuracy; recordings are stored securely by the research team and are not published. Any quotes used in reports will be anonymised, and no identifying details will appear without your explicit consent.
- Ten testimonials will be created in the context of the consultation activity, and it may require you to provide personal data in your response that may identify or make you identifiable. These personal data will only be published subject to your explicit consent. You will decide how you are identified (e.g., pseudonym or anonymous; or named attribution). You will be given a draft of your text and any image for review and approval before publication. You may withdraw consent at any time up to publication; after publication, we will stop any further use and make reasonable efforts to remove online versions within our control. If you do not agree with the identifiable information, we may still use your responses in an anonymised form, and the published material will not identify you directly or indirectly.
- It is your responsibility if you opt for confidentiality of your personal data to avoid any reference in your submission or contribution itself that would reveal your identity.
- For registration to take part in the focus group and in-depth online interview, we will use the Commission's online questionnaire tool EU Survey that requires you to login via your 'EU Login' or 'social media account'. 'EU Login' requires certain personal data such as the name, surname and e-mail address of the registrant. For further information, please refer to the privacy statements of 'EU Login' and 'EU Survey' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: DPR-EC-03187) and 'EUSurvey' (reference number: DPR-EC-01488). Should you choose to log in through your social media account, please refer to the pertinent social media platform's privacy statement.
- Your contribution to the targeted consultation is stored in the Commission's document management system (for further information on the Commission's document management system please refer to the processing operation 'Management and (short- and medium-term) preservation of Commission documents`, reference number: DPR-EC-00536).

The personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, the European Ombudsman or the European Court of Auditor.

Your personal data will *not* be used for an automated decision-making, including profiling.

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

We process your personal data, because:

(a) processing is necessary for the performance of a task carried out in the public interest;

(b) it is based on your consent, for one or more specified purposes in compliance with Article 5(1) (d) of Regulation 2018/1725:

- To be contacted by the Commission for the present consultation;
- To take part in the focus group;
- To take part in the in-depth online interview;
- To be selected for a testimonial of your experience;
- Audio recording of the focus group session;

- Audio recording of the interview session in case you agree and are selected to be part of an in-depth online interview;
- Processing of special categories of personal data (under Article 10(1) of Regulation 2018/1725, that is "personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation") whether they are necessary for the targeted consultation given the subject matter or provided spontaneously by the respondent;
- Publication of the identifiable information in the context of testimonials;

The Union law which is the basis for the processing based on Article 5(1)(a) of Regulation (EU) 2018/1725 is the Treaty of the European Union, and more specifically its Articles 1 and 11, Article 298 of the Treaty on the Functioning of the European Union, read in conjunction with Recital 22 of Regulation (EU) 2018/1725), as well as the Protocol 2 on the application of the principles of subsidiarity and proportionality.

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

In order to carry out this processing operation the following categories of personal data may be processed:

For the purpose of **focus group and in-depth online interview**:

- *name and surname,*
- *profession and place of work,*
- *country and place of residence,*
- *e-mail address of the respondent and Telephone number* (for sending invitations, scheduling, communication and confirmation of participation)
- *personal data related to the physical, economic, cultural, or social identity of the respondent, insofar as they are not falling under Article 10 of the Regulation,*
- *personal data included in the response or contribution to the targeted consultation activity, including (personal) opinions*
- *photos, audio recording.*
- *Special categories of personal data falling under Article 10 of the Regulation 2018/1725: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation*.
- *Demographic data disclosed age, sex, gender identity, disability status, migration background*

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply to the targeted consultation.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for a maximum of five years after the closure of the file to which the present targeted consultation belongs. A file is closed at the latest once there has been a final outcome in relation to the initiative to which the targeted consultation contributed.

This administrative retention period of five years is based on the retention policy of European Commission documents and files (and the personal data contained in them), governed by the common Commission-level retention list for European Commission files SEC(2025)600. It is a

regulatory document in the form of a retention schedule that establishes the retention periods for different types of European Commission files. That list has been notified to the European Data Protection Supervisor.

The administrative retention period is the period during which the Commission departments are required to keep a file depending on its usefulness for administrative purposes and the relevant statutory and legal obligations. This period begins to run from the time when the file is closed.

In accordance with the common Commission-level retention list, after the 'administrative retention period', files including (the outcome of) targeted consultations (and the personal data contained in them) can be transferred to the Historical Archives of the European Commission for historical purposes (for the processing operations concerning the Historical Archives, please see record of processing 'Management and long-term preservation of the European Commission's Archives', registered under reference number DPR-EC-00837).

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 on the servers of the Commission *(or of its contractors (processors) if contractors are engaged to assist the controller)*. 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 Commission.

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.

The Commission's processors (contractors) are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

7. Who has access to your personal 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 according to the "need to know" principle, in particular to follow-up on the targeted consultation. Such staff abide by statutory, and when required, additional confidentiality agreements.

Certain personal data may be made public on the Europa website, namely:

- any personal data on which you consented to their publication;
- personal data spontaneously provided by you in your contribution (without it being required by the targeted consultation activity.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

Third-party tools:

The interviews and focus groups, will be delivered via MS Teams, ICF's corporate collaboration platform, data is located in the EU region. Microsoft O365 will process data on the content of the interviews and meetings and conversations chats, voicemail, shared space for the research team, shared files, recordings, and transcriptions**.** For information on how MS Teams processes personal data, please see below link[1].

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. Under certain conditions, 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), on grounds relating to your particular situation.

Insofar you have consented to the certain processing 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 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.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

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 at JUST-EQUALITY-HLG@ec.europa.eu.

[1] https://privacy.microsoft.com/en-US/privacystatement#mainnoticetoendusersmodule.

- **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 Commission, which have been documented and notified to him. You may access the register via the following link: http://ec.europa.eu/dpo-register.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-01011.