



## RECORD OF PERSONAL DATA PROCESSING

Art. 31 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 "Regulation")

Record n°

10-2022

*In accordance with Article 31 of Regulation 2018/1725, individuals whose personal data are processed by the Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Agency has to keep records of their processing operations.*

*This record covers two aspects:*

- 1. Mandatory records under Art 31 of the 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*
- Migration from notification to record.*

MEDIA stands and events	
1	<b>Last update of this record (where applicable)</b> NA
2	<b>Short description of the processing</b> This record describes the processing of personal data of participants in activities implemented through the Framework Contract for services for the organisation of events and promotional actions, including stands at major audiovisual markets (EACEA/2021/OP/0002).

<b>Part 1 - Article 31 Record</b>	
3	<p><b>Name of the Controller</b> <b>Unit(s) and/or function of person acting on behalf of the Controller</b></p> <p>Controller: European Education, and Culture Executive Agency Unit: Head of Unit B2, Creative Europe MEDIA <a href="mailto:EACEA-MEDIA-PROMO@ec.europa.eu">EACEA-MEDIA-PROMO@ec.europa.eu</a></p>
4	<p><b>Contact details of the Data Protection Officer (DPO)</b></p> <p>EACEA-data-protection@ec.europa.eu</p>
5	<p><b>Name and contact details of joint controller (where applicable)</b></p> <p>NA</p>
6	<p><b>Name and contact details of processor (where applicable)</b></p> <p>Framework contract in cascade for the organisation of events and promotional actions, including stands at major audiovisual markets with the following companies:</p> <ol style="list-style-type: none"> <li>1. Framework contract n° 2022-MEDFWC-01 CF signed with CONCEPTION, ETUDES ET COOPERATION DE FORMATION (CECOFORMA) 14, rue Léon Frédéricq, 4020 Liege, Belgium</li> <li>2. Framework contract n°2022-MEDFWC-02 VO signed with VO EUROPE SA 142, rue de Stalle, 1180 Bruxelles, Belgium</li> <li>3. Framework contract n°2022-MEDFWC-03 TW signed with TEAM WORK SAS 4 Place des saisons Tour Alto, 92400 Courbevoie, France</li> </ol>
7	<p><b>Purpose of the processing</b></p> <p>The Creative Europe MEDIA unit of EACEA and the Audiovisual industry and Media support Programme Unit of DG CNECT are organising events and promotional activities, including MEDIA umbrella stands, at major audiovisual markets. They are addressed in particular to independent European companies offering strong content or audiovisual services with international potential.</p> <p>Firstly, organisation and management of the events and promotional activities: participants can register to the MEDIA umbrella stands and publish their work on the website MEDIA stands (<a href="http://www.media-stands.eu/">http://www.media-stands.eu/</a>). Upon their consent,, data subjects can be contacted for the purpose of being informed of upcoming activities by email.</p> <p>Secondly, publication of limited personal data: training programmes organised by beneficiaries receiving support from the Creative Europe MEDIA programme are publicised in the website Creative Europe MEDIA Training Guide (<a href="http://www.creative-europe-media.eu">Creative Europe MEDIA (creative-europe-media.eu)</a>). Such publication can include personal data of beneficiaries.</p> <p>These activities are outsourced to the contractors mentioned above.</p>
8	<p><b>Description of the categories of data subjects</b></p> <p>Whose personal data are being processed?</p>

	<p>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 type="checkbox"/> Agency staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the Agency</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 checked="" type="checkbox"/> Beneficiaries</p> <p><input type="checkbox"/> External experts</p> <p><input type="checkbox"/> Contractors</p> <p><input checked="" type="checkbox"/> Other, please specify: Participants in activities (MEDIA umbrella stands, events)</p>
9	<p><b>Description of personal data categories</b></p>
	<p><b>Indicate <u>all</u> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):</b></p> <p><b>a) Categories of personal data:</b></p> <p><input type="checkbox"/> in the form of personal identification numbers</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><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 checked="" type="checkbox"/> concerning telephone numbers and communications</p> <p><input checked="" type="checkbox"/> concerning names and addresses (including email addresses)</p> <p><input checked="" type="checkbox"/> Other: please specify: position, picture (optional), gender, company profile</p> <p><b>b) Categories of personal data processing likely to present <u>specific risks</u>:</b></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><b>c) Categories of personal data whose processing is <u>prohibited</u>, with exceptions (art. 10):</b></p> <p><input type="checkbox"/> revealing racial or ethnic origin</p>

	<input type="checkbox"/> revealing political opinions <input type="checkbox"/> revealing religious or philosophical beliefs <input type="checkbox"/> revealing trade-union membership <input type="checkbox"/> concerning health <input type="checkbox"/> genetic data, biometric data for the purpose of uniquely identifying a natural person <input type="checkbox"/> concerning sex life or sexual orientation  <b>d) Specify any additional data or explanatory information on the data being processed, if any: _____</b>
10	<p><b>Retention time (time limit for keeping the personal data)</b></p> <p><b>Indicate the period of storage:</b></p> <p><u>Contractor</u>  Data must be retained for a period of five years starting from the payment of the balance of the last specific contract issued under the FWC (according to article II.24.1 of the Framework contract). The contractor will delete the data upon instructions of EACEA after the end of the 5 year period.</p> <p><u>EACEA</u>  Data must be retained for 10 years starting from the payment of the balance of the last specific contract issued under the Framework Contract. This is compliant with the Common Commission level retention list for European Commission files – Second revision SEC(2019)900 /2 of 9 July 2019, file type 12.6.1.C Financial management.</p> <p><b>Is any further processing for historical, statistical or scientific purposes envisaged?</b>  <input type="checkbox"/> yes <input checked="" type="checkbox"/> no</p> <p><b>If yes, indicate the further retention time:</b></p> <p>If the answer is yes, please go to Part 2, Storage and Security for technical safeguards.</p>
11	<p><b>Recipients of the data</b></p> <ul style="list-style-type: none"> <li>- EACEA: staff members of the unit of the controller, Director and Heads of Department;</li> <li>- Contractor (processors) acting on behalf of EACEA, and their subcontractors;</li> <li>- European Commission: relevant DGs in particular the Directorate-General for Communications Networks, Content &amp; Technology (DG CNECT);</li> <li>- Sendinblue which is the tool used for emailings by the contractor and their sub-contractors (privacy policy: <a href="#">General conditions of use of Sendinblue services - Sendinblue</a> and <a href="#">GDPR: All Your Questions Answered - Sendinblue</a>).</li> </ul> <p>In case of control or dispute, the bodies charged with a monitoring or inspection task in application of Union law (e.g. Internal Audit Service, European Commission, OLAF, EU Courts etc.).</p> <p>In addition, data may be disclosed to public authorities, and processed by these authorities in compliance with the applicable data protection rules according to the purpose of the processing, including inter alia:</p> <ul style="list-style-type: none"> <li>• The European Court of Justice or a national judge as well as the lawyers and the agents of the parties in case of a legal procedure;</li> <li>• OLAF in case of an investigation conducted in application of Regulation (EC) No 1073/1999;</li> <li>• The Internal Audit Service of the Commission within the scope of the tasks entrusted by</li> </ul>

	<p>Article 118 of the Financial Regulation and by Article 49 of the Regulation (EC) No 1653/2004;</p> <ul style="list-style-type: none"> <li>• IDOC in line with Commission Decision C(2019)4231 of 12 June 2019 laying down general implementing provisions on the conduct of administrative inquiries and disciplinary proceedings and Commission Decision (EU) 2019/165 of 1 February 2019 laying down internal rules concerning the provision of information to data subjects and the restriction of certain of their data protection rights in the context of administrative inquiries, pre-disciplinary, disciplinary and suspension proceedings;</li> <li>• The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union and Article 20, paragraph 5 of Regulation (EC) No 58/2003;</li> <li>• The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union;</li> <li>• The European Public Prosecutor's Office within the scope of Article 4 of Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office.</li> </ul> <p>For networking purposes, the name, position, email, phone number and company's name of participants in the MEDIA umbrella stands are published in the website <a href="http://www.media-stands.eu/">http://www.media-stands.eu/</a> a few days before the event and removed after the event is closed.</p> <p>The contact details of the coordinators of the Training programmes organised by beneficiaries receiving support from the Creative Europe MEDIA programme Talents and skills action are published in the website Creative Europe Media training guide (<a href="https://www.creative-europe-media.eu/">https://www.creative-europe-media.eu/</a>).</p> <p>Personal data collected will never be used for marketing purposes.</p>
12	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p> <p>NA</p>
13	<p><b>General description of the technical and organisational security measures</b></p> <p>The collected personal data and related information are stored by the contractor and communicated to the Agency for every event.</p> <ol style="list-style-type: none"> <li>1. <u>Measures put in place by the contractor/sub-contractor</u> <ol style="list-style-type: none"> <li>1.1 MEDIA stands website and database</li> </ol> </li> </ol> <p>Firstly, the contractor stores the data generated in a MySQL database for the treatment purposes. The data is deleted from the MySQL database after the closure of registrations for the market in question.</p> <p>The data is then transferred to a FileMaker database only accessible locally protected by username and password. Only Antemak SPRL staff have access.</p> <p>The database and the servers hosting the data are protected by a username and a password. The servers are hosted in a data center in the Belgian territory. The access is strictly controlled (restricted access to the building, access card to the room, code mechanical on rack, surveillance cameras, etc.). The company managing the data centre is: EasyHost, Skaldenstraat 121, 9042 Gent. (<a href="https://www.easyhost.be/en/privacy-policy">https://www.easyhost.be/en/privacy-policy</a>)</p> <p>Servers are MACS, more robust than Windows or Linux servers for security purposes. The sites they host are compartmentalised and nobody except the sub-contractor Antemak SPRL has access to the administrator level. The latest security patches are applied in accordance with the manufacturer's recommendations. The network is monitored 24/7,</p>

	<p>server performance and availability can be consulted at any time. Backups of databases are done every hour, and of the website once per day. Back-up tests and checks are carried out every 3 months.</p> <p>The company hosting the website is Hostinger (<a href="https://www.hostinger.fr/">https://www.hostinger.fr/</a>). Logs on the website (http traffic) are completely anonymous. The logs contain only the legal minimum required (IP address, date, time and page consulted). A count of visits via Google Analytics is done but without identification of internet users for reporting purposes. No third party cookies are implemented, neither locally nor via external tracking.</p> <p>For the preparation of MIPTV and MIPCOM meetings with buyers, a FileMaker database is established. It contains the trade profiles of buyers who agreed to participate in these meetings. The information is published on the Media Stands website (<a href="http://www.media-stands.eu">Homepage - Media Stands (media-stands.eu)</a>) with their consent. These profiles and presentation video are deleted from the website a few weeks after the end of the event concerned.</p> <p>1.2 The website Creative Europe Media training guide (<a href="http://www.creative-europe-media.eu">Creative Europe MEDIA (creative-europe-media.eu)</a>)</p> <p>The company hosting the website is Hostinger (<a href="https://www.hostinger.fr/">https://www.hostinger.fr/</a>). Logs on the website (http traffic) are completely anonymous. The logs contain only the legal minimum required (IP address, date, time and page consulted). A count of visits via Google Analytics is done but without identification of internet users for reporting purposes. No third party cookies are implemented, neither locally nor via external tracking.</p> <p>2. <u>Measures put in place by EACEA</u></p> <p>The European Commission's IT systems used by the Agency abide by the Commission's security guidelines. The Agency must comply with Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.</p> <p>2.1 Organisational measures:</p> <p>A Corporate Local Informatics Security Officer (C-LISO) is in place. Its role includes supervising the Agency compliance with the relevant regulations, and the application of security measures recommend by DIGIT.</p> <p>Organisational measures include appropriate access rights and access control. As a rule within the Agency, access to information systems, the file system or offices are subject to a series of authorisations where the person granting the access is different from the person requesting or authorising the access - except in limited cases of delegation. The responsible person in the unit in charge of this action (processing operation of the current record) collects and places the documents on the secured drives of the Commission and all Agency staff are bound by a confidentiality obligation. The need to know principle applies in all cases.</p> <p>2.2 Technical measures:</p> <p>State of the art technical cybersecurity measures are implemented in the corporate systems, according to the security needs. Those measures are in constant evolution.</p>
14	<p><b>Information to data subjects / Privacy Statement</b></p> <p>Privacy statements will be published in the MEDIA stand website (link: <a href="http://www.media-stands.eu/">http://www.media-stands.eu/</a> and in the Creative Europe MEDIA Training Guide website (<a href="http://www.creative-europe-media.eu/">link: Creative Europe MEDIA (creative-europe-media.eu)</a>).</p>

