

## **Data Protection Statement on the processing of personal data within the Brussels Office of the European Patent Office (EPO)**

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to respecting and protecting your personal data and ensuring your rights as a data subject. All data of a personal nature that identifies you directly or indirectly will be processed lawfully, fairly and with due care.

This processing operation is subject to the EPO Data Protection Rules ([DPR](#)).

The information in this communication is provided pursuant to Articles 16 and 17 of the DPR.

This statement refers to the processing of collecting and managing the contact lists of Stakeholders relevant for the activities carried out by the EPO Brussels Office. This data protection statement explains the way in which these data are collected, used, managed and stored.

### **1. What is the nature and purpose of the processing operation?**

Personal data is processed for the following purposes:

- developing and maintaining a network of formal and informal contacts with key players such as the EU Institutions, relevant stakeholders (industry federations, NGOs, law firms, other public entities etc)
- sending invitations to EPO events
- providing information on EPO activities

The processing is not intended to be used for any automated decision making and your personal data are not going to be transferred to recipients outside the European Patent Office which are not included in Article 8 (1), (2) and (5) of the DPR not ensuring an adequate level of protection

### **2. What personal data do we process?**

The categories of personal data processed are as follows: Contact details (name, first name, email address, postal address if available, phone number), Role played in the IP field or in the relevant organisation (position, organisation to which these stakeholders belong as well as publicly available contributions they made in this field). Especially when the data subjects are members of the Parliament of the EU, this involves the processing of information revealing their political opinion as far as the latter has been manifestly made public by the data subject, The information processed would typically be, position held in political groups, reports done by or parliamentary question introduced by an MEP, remarks/comments made by an MEP and which are publicly available, remarks/comments made by an MEP in the context of a bilateral meeting with an EPO official.

### **3. Who is responsible for processing the data?**

The processing of personal data is carried out under the responsibility of the Director of the EPO Brussels Office acting as the EPO's delegated data controller.

Personal data are processed by the EPO staff involved in the management of the respective initiative, project, activity of the EPO Brussels Office.

External contractors involved in the organisation of events or the dissemination of information may also process the following personal data: name, surname, position, email address and phone numbers which are all publicly available.

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

The personal data are disclosed on a need-to-know basis to the EPO staff working in the EPO Brussels Office. Limited information of the data subjects stored on the contacts database (name, first name, organisation, position, where applicable Directorate/Department and responsibilities) will be disclosed on a need-to-know basis and for compatible purposes (e.g. to inform them on the launch of EPO studies or any EPO activities) to the EPO Communication Department

Personal data will only be shared with authorised persons responsible for the corresponding processing operations and are not used for any other purposes or disclosed to any other recipients.

#### **5. How do we protect and safeguard your personal data?**

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss, alteration and unauthorised disclosure or access.

All personal data are stored in secure IT applications according to the EPO's security standards. Appropriate levels of access are granted individually only to the abovementioned recipients.

For systems hosted at EPO premises, the following base security measures generally apply:

- User authentication and access control (e.g., role-based access control to the systems and network, principles of need-to-know and least privilege)
- Logical security hardening of systems, equipment and network
- Physical protection: EPO access controls, additional access controls to datacentre, policies to lock offices – for the EPO Brussels Office an additional badge is necessary to access the co-working premises.
- Transmission and input controls (e.g., audit logging, systems and network monitoring)
- Security incidence response: 24/7 monitoring for incidents, on-call security expert.

#### **6. How can you access, rectify and receive your data, request that your data be erased, or restrict/object to processing? Can your rights be restricted?**

You have the right to access, rectify, and receive your personal data, to have your data erased and to restrict and object to the processing of your data, as outlined in Articles 18 to 24 of the EPO Data Protection Rules.

If you would like to exercise any of these rights, please write with details of your request to the delegated data controller at [DPOexternalusers@epo.org](mailto:DPOexternalusers@epo.org). In order to enable us to respond more promptly and precisely, you always need to provide certain preliminary information with your request. We therefore encourage you to fill in this [form](#) and submit it with your request

We will reply to your request without undue delay, and in any event within one month of receipt of the request. However, according to Article 15(2) of the DPR, that period may be extended by two further months if necessary, taking into account the complexity and number of requests received. We will inform you of any such delay.

## **7. What is the legal basis for processing your data?**

Personal data is processed in accordance with Article 5 (a)DPR, the processing being necessary for the management and functioning of the EPO; This processing activities are necessary for the EPO Brussels Office to fulfil its role, which is to develop and maintain a network of formal and informal contacts with key players such as the EU Institutions, relevant stakeholders (industry federations, NGOs, law firms, other public entities etc) and for information purposes..

## **8. How long can data be kept?**

Personal data will be kept only for the time needed to achieve the purposes for which it is processed.

The contacts database is updated regularly (at least twice a year) and only relevant stakeholders are kept in the database. The data stored on the W:drive (under the folder 'Brussels Office') is kept for the period the stakeholders remain in a relevant position The data becoming obsolete are deleted from the contacts database.

In the event of a formal appeal/litigation, all data held at the time of the formal appeal/litigation shall be retained until the completion of its process.

## **9. Contact information**

If you have any questions about the processing of your personal data, please write to the delegated data controller at [DPoexternalusers@epo.org](mailto:DPoexternalusers@epo.org)

You can also contact our Data Protection Officer at [dpo@epo.org](mailto:dpo@epo.org).

## **Review and legal redress**

If you consider that the processing infringes your rights as data subject, you have the right to request review by the controller under Article 49 DPR and the right to seek legal redress under Article 50 DPR.