

Data protection statement on the processing of personal data in connection with the organisation and management of EPO meetings and events.

Protecting your privacy is of the utmost importance to the European Patent Office (EPO). We are committed to protecting your personal data and ensuring respect for data subjects' rights when performing our tasks and providing our services. All data of a personal nature that identify you directly or indirectly will be processed lawfully, fairly and with due care.

The processing operations described below are subject to the EPO Data Protection Rules ([DPR](#)).

The information in this statement is provided in accordance with Articles 16 and 17 DPR.

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

The present data protection statement describes how Principal Directorate Communication (“PD Communication”) processes personal data collected for the purpose of organising and managing meetings/events and coordinating any required follow-up activities, as well as for accountability and communication, transparency, awareness, education, and promotional purposes, such as creating audio-visual content to be published, shared or streamed through the EPO internal (e.g.: EPO TV, Newsletter, e-knowledge Portal) external (e.g.: epo.org) and social media channels, or the drafting of news items.

This data protection statement provides detailed information on all types of data that can be processed in a meeting/event organised by the EPO. Nevertheless, the exact data processed in a concrete EPO meeting/event may vary on a case-by-case basis.

Processing of personal data for the organisation and management of EPO meetings and events includes on-site or online invitation or registration of participants’ accommodation, logistics coordination; meeting/event coverage, and promotion including documentation, photos, and audio-visual recordings and their possible editing for distribution and publication for promotional purposes; event follow-up actions such as sharing of participants’ contact details and distribution of minutes and agendas, presentations and reports.

In addition to on-site events, when events are hosted online, processing of personal data may be necessary in the framework of online registration, providing access to the platform (i.e.: through invitation links or access passwords), or coordinating any technical issues affecting the execution of the event that may arise before, during or after the event takes place.

Multimedia material might be published online on EPO’s communication channels, including the EPO’s website and the EPO’s page on social media platforms, such as the EPO’s YouTube, Instagram, Twitter, LinkedIn, and Facebook.

When events are hosted online, the EPO uses general host sites such as but not limited to [MS Teams](#), [Zoom](#) or [EPOtogether](#). To facilitate discussions among participants, the EPO uses interactive tools such as Slido.

When the event includes minutes taking, the names of the participants and their function will be present in the minutes of the meeting and together with the participants’ position organisation/institution and country will be made available to the rest of the attendees.

After the organisation of some events, you may receive an email with a link to User Satisfaction Surveys. Your

feedback will be collected anonymously through MS Teams forms. Should you wish to have more information on how the EPO processes your personal data using the MS Forms, please visit this [link](#).

Your personal data may be shared by the EPO with an external provider, that in the case of online events will create and manage the relevant event platform accessible via a browser-controlled landing page. Personal data may be part of a contact details database and might be shared internally among EPO organisational units in order for them to contact data subjects in relation to similar future meetings/events. The contact details of certain categories of data subjects, such as those working for the main stakeholders with whom the EPO collaborates, institutions and national IP offices, may also be part of a list that the delegated controller updates annually and uses to send invitations to relevant events or season's greetings.

Your data may be obtained directly from you during the registration phase or acquired from another source (contact details' databases, publicly accessible sources, another participant in the meeting/event entitled to provide data on your behalf, etc.).

The EPO may use cookies on the event landing pages to offer you the best possible experience. Information collected via the cookies installed might store and share your personal data with third parties, and according to the specific policies of the platform used.

Please also be aware that, if you use the social plug-in functions or watch one of our videos posted on YouTube and embedded on the event page, this information may also be transmitted directly from your browser to the social media provider concerned and may be stored by it. Similarly, if you are logged into one of your social network accounts when visiting the event page, the social media provider concerned may assign the visit to your account and combine this additional information with other data already stored.

The processing is not intended to be used for any automated decision-making, including profiling.

Your personal data will not be transferred to recipients outside the EPO that are not covered by Article 8(1) and (5) DPR unless an adequate level of protection is ensured. In the absence of an adequate level of protection, a transfer can only take place if appropriate safeguards have been put in place and enforceable data subject rights and effective legal remedies for data subjects are available, or if derogations for specific situations as per Article 10 DPR apply.

2. What personal data do we process?

Prior to, during and after a meeting/event, the EPO processes participants' identification data to organise and manage the meeting/event. Depending on the on-site or online nature of the event, and its complexity, this data may include the title, name, surname, gender, short biographies, profile picture, ID/Passport number, phone number, date of birth, nationality, postal and/or email addresses, signature, profession, position held, organisation/institution, country, city of departure, bank details, fiscal code and address for reimbursements purposes, individualised information on the form of transport and accommodation. Depending on the nature of the meeting/event, health-related data, such as mobility and dietary requirements, allergies, and intolerances, might be gathered. In certain cases, your IP address, session entry time or interactions might be processed in the events where cookies are used. In that case, you will be duly informed of the full conditions by means of a Cookie Policy.

In addition, sound, video, or audio-visual recordings will be made during the meeting/event. This might include the participation in presentations/interviews/workshops using Q&A tools. If that is the case, images/photos, statements, opinions, etc. may be processed depending on the type of recording and the purpose(s) of the recording.

When the event includes participation of speakers, we will publish the agenda of the meeting with the name, affiliation and intervention title of the speakers. We might publish other personal information that the speakers provide us with, such as a CV, photos, presentations, etc. If you are a speaker and you do not wish your image/voice to be photographed/recorded/web published or that we disseminate the agenda of the Meeting with your name, affiliation and intervention title, your CV, or other data you have provided us, for compelling and legitimate grounds, you can always 'object'. In this case, please contact the meeting/event organisers in advance and specify the reasons due to which your legitimate interests might be prejudiced by the disclosure of your data, so that they can take your wish into account.

If you do not want your image/voice to be photographed/recorded/web published, for compelling and legitimate grounds, you can always exercise your right to object, e.g., choose not to be present when the photographing/recording occurs or disable your camera when the recording starts. In this case, please, contact the meeting/event organisers in order to allow them to take your wish into account when filming and taking photographs and offer you an alternative solution. In general, for on-site events, a specific area is designated where the attendees who do not want to appear in the videos/photos will be invited to sit.

Please, note that objecting to the processing of your personal data does not affect the lawfulness of the processing done prior to the objection.

3. Who is responsible for processing the data?

Personal data are processed under the responsibility of the Principal Directorate Communication acting as the EPO's delegated data controller.

Personal data are processed by the PD Communication and BIT staff involved in managing the meetings and events.

External contractors involved in managing meetings and events may also process personal data, which can include accessing it.

4. Who has access to your personal data and to whom are they disclosed?

Personal data, depending on its type and the purposes of its processing, are only made accessible on a need-to-know basis to EPO staff members and possibly external providers, their subcontractors and the general public respectively.

Personal data is accessed by:

- The EPO staff working in PD Communication, on a need-to-know basis;
- Other departments or organisational units (e.g., Talent Academy and Legal Affairs) involved in managing the initiative, project, or activity;
- CTO, responsible for the maintenance of some of the databases used in the process of the organisation of events;
- Hospitality, security and logistics internal teams and external providers responsible for event logistical support, creation of audio-visual material or similar services in some of the meetings and events or provision of registration tools, event platforms or landing pages for events;
- Subcontractors, providers and suppliers of the relevant external providers that the EPO might establish a contractual relationship with.

Personal data may be accessible to EPO employees through internal communication tools such as the Intranet, EPO Newsletter, EPO TV and videos shown at meetings/events. Pictures, presentations, live web streaming and/or audio-visual recordings of speakers, participants and organisers might be made available through external communication tools to the general public on the external website, EPO Social Media channels or to other IP Offices websites in the framework of the promotion of EPO and IP activities.

The recipients of personal data (EPO staff, external resources, the rest of the participants and/or the general public) might vary depending on the type of recording and the purpose of the meeting/event.

Specific information on the exact recipients and the legal instruments used for each meeting/event is available upon request.

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 or alteration and unauthorised disclosure or access.

All personal data are stored in secure IT applications in accordance with the EPO's security standards. Appropriate levels of access are granted individually only to the above-mentioned recipients.

For systems hosted on EPO premises, the following basic 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 on locking offices;
- Transmission and input controls (e.g., audit logging, systems and network monitoring);
- Security incident response: 24/7 monitoring for incidents, on-call security expert.

In principle, the EPO has adopted a paperless policy management system; however, if paper files containing personal data need to be stored on EPO premises, they are locked in a secure location with a restricted access.

For personal data processed on systems not hosted on EPO premises, most of the external providers supporting the EPO generally commit in a binding agreement to comply with their data protection obligations under the applicable data protection legal frameworks. The EPO has also carried out a privacy and security risk assessment. These systems are required to have implemented appropriate technical and organisational measures such as: physical security measures, access and storage control measures, securing data at rest (e.g., by encryption); user, transmission and input control measures (e.g., network firewalls, network intrusion detection system (IDS), network intrusion protection system (IPS), audit logging); conveyance control measures (e.g., securing data in transit by encryption).

6. How can you access, rectify and receive your data, request its deletion, restrict its processing or object to it? Can your rights be restricted?

You have the right to access, rectify and receive your personal data, not to be subject to a decision based solely on automated processing, to have your data erased and to restrict and/or object to the processing of your data (Articles 18 to 24 DPR).

If applicable, you can withdraw your consent for the processing of your personal data at any time. Please note that withdrawing your consent for the processing of your personal data does not affect the lawfulness of any processing based on your consent before this consent is withdrawn.

If you would like to exercise any of these rights, please write to the delegated data controller. 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](#) (for externals), [form](#) (for internals) and/or [form](#) (for pensioners) 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, Article 15(2) DPR provides that this period may be extended by two further months if necessary, in view of 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 are processed in accordance with the following legal basis of article 5 of the DPR:

- a. processing is necessary for the performance of a task carried out in the exercise of the official activities of the European Patent Organisation or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the Office's management and functioning, or
- c. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, or
- d. the data subject has given explicit consent to the processing of their personal data for one or more specific purposes, or

e. processing is necessary in order to protect the vital interests of the data subject or of another natural person.

For health-related data, personal data are processed in accordance with article 11(2)(a) of the DPR: 'the data subject has given explicit consent to the processing of those data for one or more specified purposes.' For example, dietary requirements or special assistance.

8. How long do we keep your personal data?

Personal data processed by the data controller or the service providers under its supervision are stored for the period of time necessary to achieve the purpose for which they have been processed.

Personal data will be kept only by PD0.2 for the time needed to achieve the purposes for which it is processed and then deleted from its databases as follows:

- For personal data related to sound, video and audio-visual recording/photographs of meetings and events, they are stored for educational, institutional, historical, informational and/or promotional purposes for a period ranging from 2, 10 or 25 years according to the retention categories reflected in the PD Communication Audio-visual Retention Policy, which can be provided upon request. Events that can fall in the aforementioned retention categories are:
 - Recurrent events with a low level of newsworthiness (2 years renewable);
 - Non-recurrent events related to the core business of the EPO, for example related to the promotion of patent knowledge activities (10 years renewable);
 - Recurrent events with a high level of newsworthiness related to the core activity of PD Communication at the EPO (e.g.: European Inventor Award, European Patent Convention 50 years celebration) (25 years renewable).
- For personal data related to contact details (e.g.: name, surname, email address, affiliation) they are stored for and deleted after a maximum period of 5 years as part of an internal EPO contact details database owned by PD Communication and shared internally among EPO organisational units in order for them to contact data subjects for similar future meetings/events.
 - Nevertheless, in the event that the data subject shows interest in continuing to be part of this list, Principal Directorate Communication may keep their data for a further period of up to 5 years, or until the data subject indicates otherwise or the data controller becomes aware that the data subject cannot longer be part of the list e.g., receipt of an automatic error reply that confirms that the contact details no longer exist. In order to prevent inaccurate data being kept indefinitely, after the 5-year maximum period they will be asked regularly whether they wish to remain on the list and whether their data is still accurate.
- Additionally, for speakers who agreed to be contacted for future events, personal data such as short biographies, CVs, Intervention title, or any additional personal data provided by them are stored for a maximum period of 3 years, or for a shorter period if the if the EPO becomes aware that the data subject can no longer be part of the database (e.g.: Upon retirement of the speaker). In order to prevent inaccurate data to be kept indefinitely, after the 3-year maximum period they will be asked regularly whether they want the EPO to keep the personal data.
 - For other data (e.g.: ID/Passport number, date of birth, postal addresses, signature, profession, country, city of departure, bank details, fiscal code and address for reimbursements purposes, individualised information on the form of transport and accommodation), they will be stored and deleted after a maximum period of 1 year after the event.
 - Nevertheless, part of the data (i.e. bank details, fiscal code and address if applicable) are stored a longer period of time for accounting purposes.
 - Health-related data are stored and deleted after a maximum period of 1 month after the event if the participant has not withdrawn their consent. In case the consent has been withdrawn, the data will be deleted without undue delay. In case a health-related incident has been reported after the event, health-related data is stored until the closure of any legal proceedings.

- For personal data in connection to the subscription to EPO newsletters, personal data will be stored and deleted according to the data protection statement for the EPO's newsletters and related alerts. Please click on the [link](#) to access the document.
- For personal data related to tracking information, personal data will be stored and deleted according to the relevant Cookie Policy in place for the event, if applicable.

If personal data, for promotional purposes only, are made available on social media, the retention period will be determined by such platforms.

In the event of a formal appeal/litigation, all data held at the time the formal appeal/litigation was initiated will be retained until the proceedings have been closed.

9. Contacts and contact information

If you have any questions about the processing of your personal data, internals may write to the delegated controller at PDComm-DPL@epo.org or the Data Protection Officer at DPO@epo.org.

Externals may write to the delegated data controller and/or the DPO at DPOexternalusers@epo.org.

Review and Exercise of Remedies

If you consider that the processing infringes your rights as a data subject, you have the right to request a review by the controller pursuant to Article 49 DPR and, if you do not agree with the outcome of such review, to exercise the remedies provided for in Article 50 DPR