

Data protection statement on the processing of personal data in the context of Art Management and the EPO art collection

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.

[Please provide a brief description of the processing operations]

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

This data protection statement relates to the processing of personal data in the context of managing the EPO art collection and related activities.

Personal data are processed to:

- manage the EPO art collection and administer asset register;
- document provenance, attribution and authenticity of artworks;
- organise conservation, transport, installation and exhibition of artworks;
- manage copyright and usage rights;
- support communication activities, publications and audiovisual content;
- fulfil contractual and insurance-related obligations;
- ensure long-term preservation of art-related documentation and historical records.

The processing includes activities such as the presentation of the EPO art collection in exhibitions, guided tours, publications, audiovisual productions, its conservation and transport, as well as communication with artists, partners and other stakeholders.

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

2. What personal data do we process?

The following categories of personal data are processed:

- Artists: name, surname, limited biographical information, copyright-related information;

- Project partners and service providers: name, professional contact details (email, affiliation);
- EPO staff borrowing art works from the collection (name, function, room number);
- Correspondents and enquiry contacts: name and contact details;
- Content-related data: images, audiovisual material, descriptive texts and documentation relating to artworks, including where individuals (artists or EPO staff) may be identifiable;
- Operational data: documentation related to conservation, logistics, transport, contracts and provenance.

No special categories of personal data (within the meaning of Articles 11 and 12 DPR) are processed.

3. Who is responsible for processing the data?

Personal data are processed under the responsibility of DG4 – 44 General Administration, acting as the EPO's delegated data controller.

Processing is carried out by the EPO curator and authorised team members involved in Art Management activities.

External processors (e.g. transport companies, conservators, IT service providers or audiovisual/media providers) may process personal data on behalf of the EPO in the context of their services.

Certain external partners (e.g. museums, insurers or art dealers) act as independent controllers where they determine the purposes and means of processing.

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

Personal data are disclosed on a need-to-know basis to authorised EPO staff involved in art management, communication, legal support, insurance, archiving and logistics.

Personal data may also be disclosed to external partners such as museums, insurers, art specialists, conservators, transport providers and other service providers, where necessary for:

- the organisation of exhibitions and loans;
- the acquisition, valuation and insurance of artworks;
- conservation, transport and installation activities;
- the preparation of publications, catalogues, films and other communication materials, including where artists or EPO staff are identifiable;
- fulfilment of contractual obligations.

All disclosures are limited to what is necessary and subject to appropriate contractual and confidentiality safeguards.

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.

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 and to request restriction or objection to their processing.

Where processing is based on consent (in particular for the publication of images or audiovisual material), you have the right to withdraw your consent at any time, without affecting the lawfulness of processing carried out before its withdrawal.

If you would like to exercise any of these rights, please write to the delegated data controller at dpl.pd44@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: [form](#) (for externals) or [form](#) (for internals) 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 where 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 on the basis of Article 5 DPR, depending on the activity:

- processing necessary for the management and functioning of the EPO;
- processing necessary for the performance of contractual arrangements;
- processing based on consent where required, in particular for publications, exhibitions, films and communication activities involving identifiable individuals (artists or EPO staff), especially for the use and publication of images or audiovisual material;
- for artists, such consent is obtained through copyright contracts governing the use of artworks and associated information;
- for EPO staff, consent is obtained where applicable in accordance with internal communication and publication practices;
- processing necessary for archival and historical purposes.

The provision of personal data may be necessary in the context of contractual relationships.

8. How long do we keep your data?

Personal data are retained for as long as necessary for the purposes described above.

In principle:

- personal data are retained for the lifecycle of the artwork;
- certain data may be deleted when no longer necessary (e.g. in case of depreciation);

- archival documentation may be retained for longer periods or permanently, where justified by historical value;
- data included in publications or audiovisual materials may continue to be retained as part of communication or archival records;
- correspondence data (e.g. emails) may be retained in line with operational needs.

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. Contact information

If you have any questions about the processing of your personal data, please write to the delegated data controller at dpl.pd44@epo.org

You can also contact our Data Protection Officer at dpo@epo.org.

Review and legal redress

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