

## **Data protection statement on the processing of personal data in the organisation and management of meetings and events by Principal Directorate Communication**

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.

This data protection statement relates to the processing of personal data by the European Patent Office (EPO), and in particular by its Principal Directorate Communication ("PD Communication"), for the purpose of organising and managing on-site and virtual meetings, events, conferences, competitions, training sessions, webinars, seminars, broadcasts and campaigns (hereinafter collectively referred to as "meetings/events"). The data collected are used not only to coordinate and manage these events, but also for accountability, communication, transparency and educational and promotional purposes. This may include creating and sharing audiovisual content through the EPO's internal and external communication channels and drafting related news items.

This data protection statement thus explains the way in which PD Communication performs the processing activities and the types of personal data that may be processed for events organised by the EPO. The exact data processed for a specific event may nevertheless vary on a case-by-case basis.

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

Personal data are processed in the context of several activities that are necessary to organise and manage meetings/events.

The processing activities envisaged regard:

1. Invitations and participation in the registration process
  - collecting contact details to issue invitations

The personal data of data subjects who have subscribed to EPO newsletters and alerts may be part of a contact details database that is only used to contact them with information regarding topics they

have indicated interest in. For more information about these processing activities, please read the "[General external tasks and activities of PD Communication data protection statement](#)."

Additionally, certain data subjects may also receive some of these invitations because they are part of the EPO Stakeholder Central Database, which is a list of contacts that the EPO manages to maintain the EPO's institutional and strategic relations with them. For more information about this processing activity, please refer to the dedicated data protection statement.

- managing responses and registrations
- co-ordinating logistical needs
- providing meeting/event-related information in advance
- for certain meetings/events, collecting personal data related to contest entries or participation in competitions such as, but not limited to, EPO CodeFest, and for determining winners and distributing any prizes
- statistical purposes: when a data subject completes a form to attend an event, the registration platform collects personal data required for participation. Additionally, it may collect other personal data for statistical purposes, such as country or gender. This information is processed by the EPO in an anonymised statistical format. The EPO is aware that some personal data requested for statistical purposes and to support the EPO's Diversity and Inclusion objectives may be sensitive, so a "prefer not to say" option is available. This will not affect their event registration or participation.

## 2. Activities with speakers, panellists and moderators

In the case of meetings/events with speakers, panellists or moderators, additional data may be collected to ensure smooth co-ordination and support promotional activities. This includes:

- collecting biographies or CVs, photos and professional details for meeting/event materials.
- including their names and roles in the programme shared with the public.
- publishing/posting relevant information for promotional purposes, e.g. in press releases, news items or social media
- collecting opinions and statements about the meeting/event.

## 3. Documentation and promotional activities

- recording and documenting meeting/event details such as agendas, presentations and minutes. When the meeting/event includes minute-taking, the participants' names and their function may be recorded in the minutes of the meeting along with their position, organisation/institution and country, all of which will be made available to the rest of the attendees.
- capturing screenshots and taking photographs and videos during the meeting/event. The participants will be informed whenever any recordings are planned and asked if they wish to not be recorded. They will be notified automatically when any recording starts.
- editing and distributing materials for promotional purposes across the EPO's internal and external platforms such as, but not limited to, newsletters, the EPO website, podcasts and social media.
- using screenshots, photographs, videos and other multimedia content generated during meetings/events to promote EPO activities.
- using photographs, videos and other multimedia content generated during meetings/events to highlight the collaboration between, for example, the EPO and other intellectual property offices or other stakeholders such as local institutions to promote the EPO art collection or universities.
- including photographs, videos and other multimedia content generated during meeting/events in the Annual Review material to be shared with the governing body of the EPO, the Administrative Council.

#### 4. Online meeting/event hosting

- using general hosting sites such as, but not limited to, MS Teams, Zoom, EPOtogether and Spark up.
- using interactive tools such as Slido, which can be used by participants to send their questions anonymously. However, it is encouraged that all questions be shared with a name since this helps the EPO engage more personally with data subjects.
- managing online registration and providing access links to the meeting/event platform.
- co-ordinating the technical support needed before, during or after the meeting/event to address access issues. The personal data of data subjects who decide to participate in a meeting/event may be shared by the EPO with an external provider, who, in the case of online meetings/events, will create and manage the relevant meeting/event platform accessible via a browser-controlled landing page.

#### 5. On-site meeting/event hosting

- registering participants upon arrival and verifying their identity as needed.
- managing seating arrangements, accessibility, accommodations, catering and other logistical requirements.
- providing the necessary meeting/event materials and follow-up information on site.

#### 6. Post-event surveys and feedback

After certain meetings/events, you may receive an email or be provided with a link to a "user satisfaction survey" via the event platform's chat feature. Your feedback will be collected anonymously through MS Teams or Zoom forms, for instance. For more information about how the EPO processes your personal data, please see the corresponding [Data Protection Statements](#),

The event administrators can ask for space analytics regarding the use of the platform. The company may provide anonymised space analytics reports in which the number of attendees in the entire space, including the rooms, geolocation spread, and time spent on the platform, can be seen. All these details and reports can be requested per space and specific time and date.

Personal data may be obtained directly from data subjects during the registration phase or acquired from other sources (contact details databases, publicly accessible sources, another participant in the meeting/event authorised to provide data on their behalf, etc.).

#### 7. Cookies and online tracking

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

If you use the social plug-in functions or watch one of our videos posted on YouTube and embedded on the meeting/event page, please be aware that this information may also be transmitted directly from your browser to the social media provider concerned and then stored. Similarly, if you are logged into one of your social network accounts while visiting the meeting/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 occur 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.

The processing activity may leverage the use of artificial intelligence (AI) in its applications, and services. More specifically we may use AI-powered systems and tools for content generation and content support or improvement, such as but not limited to Copilot and Heygen to generate or support the creation of text, images or videos; assist with content editing and correction; analyse and compare search visibility; monitor brand presence in AI-generated responses; automate insights, and enhance productivity in digital communication. The deployment and use of AI in this processing activity adheres to stringent requirements in the processing of personal data.

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

The following categories of personal data are processed:

- identification and contact information: title, name, surname, gender, short biographies, profile picture, ID/passport number, phone number, date of birth, nationality, signature, and email and postal addresses.
- professional details: profession, job position, organisation/company/institution, country and city, presentations and biographies or CVs.
- gender: as explained above, users filling in a registration form to participate in an event are asked to indicate their gender (or indicate "prefer not to say"). This information is processed in an aggregated and anonymous way for statistical purposes only and is used to support the EPO's diversity and inclusion objectives.
- other information provided by the participant when entering a contest that may contain personal data.
- financial and logistical data (for reimbursement purposes if applicable): bank details, address and information related to transportation and accommodation.
- health-related data: for on-site events, information such as mobility and dietary requirements, allergies and intolerances may be gathered where necessary. This information is anonymised for utmost discretion and used only for the purpose of providing data subjects with the best possible service.
- for online meetings/events: IP address, session entry time or interaction data may be processed if cookies are used. Participants will be informed of all terms and conditions related to cookies through a dedicated cookie policy.
- voice, visual and audio-visual material: images, photos, questions asked using the meeting/event organiser's Q&A tool, interviews, statements, opinions and other contributions.

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

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

Personal data are processed by the EPO staff involved in managing the initiative, project or activity of PD Communication referred to in this statement.

External contractors involved in managing meeting/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 are disclosed on a need-to-know basis to:

- EPO staff working in PD Communication
- other departments or organisational units involved in managing the meeting/event

- the CTO, which is responsible for maintaining some of the databases used in the process of organising meetings/events
- internal hospitality, security and logistics teams and external providers responsible for the meeting/event's logistical support, creation of audio-visual material or similar services in some of the meetings/events or the provision of registration tools, meeting/event platforms or landing pages for meetings/events
- subcontractors, providers and suppliers working for the relevant external providers with whom the EPO might establish a contractual relationship

The recipients of personal data may vary depending on the type of recording and the purpose of the meeting/event. For instance, 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 the speakers, participants and organisers may be made available to the general public through external communication tools on the external website, EPO social media channels or other external stakeholders such as the IP Office or Universities, among others, as part of promoting EPO and IP activities

Specific information on the 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 the 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 data centre
- transmission and input controls (e.g. audit logging, systems and network monitoring)
- security incident response: 24/7 monitoring for incidents, on-call security expert

For personal data processed on systems not hosted on EPO premises, most 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, measures to secure data at rest (e.g. by encryption), user-, transmission- and input-control measures (e.g. network firewalls, a network intrusion detection system (IDS) and network intrusion protection system (IPS), audit logging and conveyance control measures (e.g. securing data in transit by encryption).

## **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, 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).

All data subjects have the right to object to the processing of their data if they have compelling or legitimate grounds. To do so, data subjects are encouraged to contact the event/meeting organiser in advance (three calendar days at the latest) to allow them to take their request into account. Data subjects should also state why their legitimate interests may be prejudiced by the disclosure of their data. This proactive communication will allow the EPO to consider and accommodate their preferences where possible, thus ensuring their rights are respected in the meeting/event planning and documentation. For instance, during an online meeting/event, data subjects can keep their cameras switched off.

When you attend any event as an observer, please note that we will be taking general photos and videos to document and promote them. These may be shared on our website and social media platforms, in newsletters, or through internal channels. The cameras will capture the overall atmosphere of the event and will not focus on individual audience members.

If you have valid reasons for not appearing in photographs or video footage and wish to exercise your data protection rights, please contact the organiser at least three days in advance so that your request can be processed and taken into account.

If you would like to exercise any of these rights, please write to the delegated data controller at [pdcomm-dataprotectionliaison@epo.org](mailto:pdcomm-dataprotectionliaison@epo.org). 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 external participants), this [form](#) (for internal participants) and/or this [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 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:

- a. Processing is necessary for the performance of a task carried out in the exercise of the official activities of the EPO or in the legitimate exercise of the official authority vested in the controller, which includes the processing necessary for the EPO's management and functioning, or
- b. Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract, or
- c. Processing is necessary if the data subject has given explicit consent to the processing of their personal data for one or more specific purposes, or
- d. Processing is necessary to protect the vital interests of the data subject or another natural person (e.g. in case of allergic reactions in the context of catering or if an emergency such as a fire, flood or security threat occurs necessitating evacuation).

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". This includes, for instance, dietary requirements or special assistance.

## **8. How long do we keep your data?**

Personal data processed by the EPO 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 the EPO for the time needed to achieve the purposes for which they are processed and then deleted from its databases as follows:

A) Personal data related to sound, video and audio-visual recording/photographs of meetings/events are stored for educational, institutional, historical, informational and/or promotional purposes for periods ranging from 2, 10 and 25 years according to the retention categories reflected in the PD Communication Audio-visual Retention Policy, which can be provided upon request. Meetings/events that may fall within the aforementioned retention categories are:

- recurrent meetings/events with a low level of newsworthiness (2 years renewable)
- non-recurrent meetings/events related to the core business of the EPO (e.g. those held to promote patent knowledge activities (10 years renewable)
- recurrent meetings/events with a high level of newsworthiness related to the core activity of PD Communication at the EPO (e.g. European Inventor Award, commemoration events) (25 years renewable)

B) Personal data related to the contact details of moderators, speakers and all stakeholders that actively participate in meetings/events are stored and deleted according to the following:

- for a maximum period of 5 years as per the EPO Retention Policy, which can be provided to the data subject upon request
- when the data controller becomes aware that the data subject can no longer be on the list (e.g. receipt of an automatic error reply confirming that the contact details no longer exist)
- until the data subject indicates otherwise

Personal data is kept in the EPO stakeholder database and shared internally among EPO organisational units. Further information [can](#) be found in the specific data protection statement.

To prevent inaccurate data from being kept indefinitely, data subjects will be regularly asked after the 5-year maximum period whether they wish to remain on the list and whether their data is still accurate.

C) Additionally, personal data such as short biographies, CVs, intervention titles or any additional personal data provided by moderators/speakers are stored for a maximum period of 3 years or for a shorter period if the EPO becomes aware that the information is outdated or the data subject can no longer be part of the database (e.g. upon retirement of the speaker).

D) Any other data (e.g.: ID/Passport numbers, date of birth, postal addresses, signature, profession, country, city of departure, bank details, fiscal code and address for reimbursement purposes, individualised information regarding the type of transport and accommodation) will be stored and deleted after a maximum period of 1 year following the meeting/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.

E) Health-related data are stored and then deleted after a maximum period of 1 month following the meeting/event if the participant has not withdrawn their consent. If consent has been withdrawn, the data will be deleted without undue delay. If a health-related incident has been reported after the meeting/event, health-related data is stored until the closure of any legal proceedings.

F) Personal data related to EPO newsletter subscriptions will be stored and deleted according to the [data protection statement for the general external tasks and activities carried out by PD Communication](#).

G) Personal data related to tracking information will be stored and deleted according to the relevant Cookie Policy in place for the meeting/event, if applicable.

H) As for personal data made available on social media for promotional purposes only, the retention period will be determined by the platforms in question.

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 come to an end.

## **9. Contact information**

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

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

External data subjects may write to the delegated data controller and/or the Data Protection Officer at [DPOexternalusers@epo.org](mailto:DPOexternalusers@epo.org).

## **Review and legal redress**

If you consider that the processing infringes on 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.