



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Interoperability Testing for EUDI Wallet – Test Management Platform

Data Controller: European Commission, Directorate-General for Communications Networks, Content and Technology (DG CNECT), Unit CNECT.H.4 "Digital Identity and Trust"

Record reference: [DPR-EC-07046](#)

Data Processors:

- Netcompany – Intrasoft S.A (2b, rue Nicolas Bové, L-1253, Luxembourg)
- Scytáles AB (Polygonvägen 53, Täby, 187 66, SE110 Stockholms län, Sweden)
- A4Advisory B.V. (Maresingel 67, 2316HE Leiden, Netherlands)
- Deloitte Consulting & Advisory BV (Gateway building Luchthaven Brussel Nationaal 1J, 1930, Zaventem, Belgium)
- DELOITTE ALEXANDER COMPETENCE CENTER (VEPE Technopolis – Building Z2, 555 35, Pylaia, Thessaloniki, Greece)
- Deloitte Consulting SB Srl (Via Tortona 25, 20144, Milan, Italy)
- NTT DATA Belgique SRL (Rue de Spa 8, 1000 Bruxelles, Belgium)

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1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation “Interoperability Testing for EUDI Wallet – Test Management Platform” undertaken by CNECT H.4, is presented below.

2. Why and how do we process your personal data?

CNECT H.4 collects and uses your personal data to provide you with testing service and to keep a record of actions taken in this regard.

The Launchpad Test Management platform, operated by Netcompany-Scytales, is a web-based test platform used to support the organisation and execution of interoperability testing activities. The platform enables the registration of participants, management of test cases, and reporting of test results in accordance with predefined EUDI Wallet technical specifications and standards.

Registered participants are required to complete an onboarding process, during which they may provide information about their testing capabilities. This information is used by the organisers to coordinate and match participants for testing activities as appropriate. The platform is limited to interoperability testing purposes only.

The objective of the interoperability testing is to give a possibility for EUDI Wallet stakeholders to verify that different systems or software can work together seamlessly and exchange data correctly.

Personal data collected through the Launchpad Test Management Platform is related to the access management, registration and provision of testing services, testing-related communication with users (e.g. notifying of test plans, reporting on test execution, etc.), revision and reuse of historical data related to the interoperability tests performed by users.

The Launchpad Test Management Platform uses automated decision-making processes to match participants based on the capabilities of their test objects. However, these processes do **not** involve any personal data of participants and therefore do **not** constitute automated decision-making within the meaning of **Article 24 of the EUDPR**.

3. On what legal ground(s) do we process your personal data

The lawfulness of the data processing for testing service is identified as Article 5(1)(a) of Regulation (EU) 2018/1725 (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body), the legal basis being the DEP Regulation (Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme and repealing decision (EU) 2015/2240), in particular Article 8 of the DEP Regulation, which reads: *“The financial contribution from the Union under Specific Objective 5 - Deployment and Best Use of Digital Capacities and Interoperability shall pursue the following operational objectives while bridging the digital divide:*

- g. support the design, testing, implementation, and deployment and maintenance of interoperable digital solutions, including digital government solutions, for public services at Union level which are delivered through a data-driven reusable solutions platform aiming to foster innovation and establish common frameworks in order to unleash the full potential of the public administrations' services for citizens and businesses.”*

4. Which personal data do we collect and further process?

In order to carry out this processing operation, CNECT H.4 processes the following categories of personal data:

- Name (first and last name)
- Organisation/Corporate name for which the interoperability tests are to be carried out;
- Address of company
- Email address
- Country

5. How long do we keep your personal data?

CNECT H.4 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing. Personal data processed for the purpose of creating an account in the Launchpad Test Management platform and testing of peer-to-peer interoperability in the Launchpad Test Management platform will be deleted by the data processor within 40 working-days after the event completes. CNECT H.4 will keep a report of the test results for a maximum of 5 years.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the Commission and its processors. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's processors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations

deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know basis for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the Commission staff (CNECT H.4 and DIGIT B.3) responsible for carrying out this processing operation and to other authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

CNECT H.4 also share your personal data with the processors as needed to fulfil the provision of services.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

No international data transfers to third countries take place.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the **right to object to the processing of your personal data**, which is lawfully carried out pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have

comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller at CNECT-H4@ec.europa.eu.

- **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-07046**.