



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Onboarding and operations of the EBSI Sandbox

Data Controller: European Commission, Directorate-General for Communications, Networks, Content and Technology, Unit E.3 (hereafter “CNECT. Unit E.3”)

Data processor:

- Bird & Bird AARPI, 2, rue de la Chaussée d’Antin, 75009 Paris, France

Data sub-processors:

- OXYGY SRL, via S. Martino, 14, 20122 Milan, Italy
- WBNoDe B.V. (operating under the trade name Warren Brandeis), Krom Boomssloot 20 2V, 1011 GW, Amsterdam, Netherlands
- Thomson Reuters, Five Canada Square, Canary Wharf, London, United Kingdom, E14 5AQ

Record reference: DPR-EC-21368

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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 “*Onboarding and operations of the EBSI Sandbox*” undertaken by CNECT Unit E.3 is presented below.

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

Purpose of the processing operation: CNECT Unit E.3 collects and uses your personal information for the purpose of facilitating the onboarding into and the operation of the European Blockchain Regulatory Sandbox.

Your personal data will *not* be used for an automated decision-making including profiling.

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

We process your personal data, because the 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 (**Article 5(1)(a) of Regulation (EU) 2018/1725**).

The Commission’s initiative for the European Blockchain Regulatory Sandbox finds its basis in the Digital Europe Programme ⁽¹⁾, the Commission’s Communication on “An SME Strategy for a sustainable and digital Europe” ⁽²⁾ and the Commission’s Communication “A European Strategy for Data” ⁽³⁾. With the sandbox the Commission responds to a call for action in the Council ⁽⁴⁾.

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

In order to carry out this processing operation, CNECT Unit E.3 collects the following categories of personal data:

⁽¹⁾ Regulation (EU) 2021/694 of the European Parliament and of the Council of 29 April 2021 establishing the Digital Europe Programme, in particular part 5.2.

⁽²⁾ An SME Strategy for a sustainable and digital Europe COM (2020) 103 (10. March 2020).

⁽³⁾ A European strategy for data COM(2020) 66 (19. February 2020).

⁽⁴⁾ Council Conclusions on Regulatory sandboxes and experimentation clauses as tools for an innovation-friendly, future-proof and resilient regulatory framework that masters disruptive challenges in the digital age, 13026/20 BETREG 27 (16 November, 2020).

For selected applicants:

- If you are listed in the application form as the **authorized representative**:
 - Your first and last name;
 - Your function;
 - Your business e-mail address;
 - Signature on the declaration of honour;
- If you are listed as the **contact person** in the application form:
 - Your first and last name;
 - Your e-mail address;
- any other personal data that you submit as part of the application knowing that you are contractually bound to only include personal data as part of your application if that is strictly necessary for the application.

For employees of selected use case owners, their consortium partners and regulators:

- If you are one of the seven employees given credentials for the Access platform:
 - Your first and last name;
 - Your business e-mail address;
- If you are one of the seven employees attending a Sandbox meeting:
 - Your first and last name;
 - Your e-mail address;
- Your first and last name if you upload any documents on the Access platform;
- any other personal data that you provide in the questions and feedback generated on the Access platform knowing that you are contractually bound to only upload personal data on the Access platform if that is strictly necessary;

For officials of the Commission and/or employees of the contractors that are involved in the application and selection process:

- Your first and last name
- Your email address
- Any email communications you send us in the context of the application and selection process.

We collect this information directly from you or through the website or tools we use or because the person that filled-in the application form provided us with your personal data.

Whenever we collect personal data directly from you, we will indicate whether the provision of personal data is mandatory. Such will be the case where we require personal data as part of the application process. If this data is not provided, this could mean that you cannot participate in the European Blockchain Regulatory Sandbox.

5. How long do we keep your personal data?

CNECT Unit E.3 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely until for the following periods:

- The selected application forms, selection process outcomes and other associated data will be destroyed after the end of the sandbox operations of each cohort (after a maximum of one year) and on 12/10/2025 at the latest. Wait-listed applications that participate in the next cohort will be retained until the end of the Sandbox operations for the next cohort and until 12/10/2025 at the latest.
- Personal data shared by participants during the operations of the Sandbox will be destroyed after the end of the sandbox operations of each cohort (after a maximum of one year) and on 12/10/2025 at the latest.
- Personal data for officials of the Commission and/or employees of the contractors: will be archived offline at the end of the regulatory sandbox project in compliance with the mandatory bar rules applicable to Bird & Bird in its capacity as advice provider.

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 either on the servers of the European Commission or those of the 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 contractors 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 a number of technical and organisational measures in place. 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 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 responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to your personal data is also provided to the staff of the processors responsible for carrying out this processing operation according to the "need to know" principle.

Please note that pursuant to Article 3(13) of the Regulation, public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

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.

International transfers

Though your personal data will be stored in the EU, some employees from consortium members could access it from the United Kingdom. This transfer would be based on Article 47 of Regulation (EU) 2018/1725, and in particular on [Commission Implementing Decision of 28.6.2021 pursuant to Regulation \(EU\) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom](#).

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 CNECT Unit E.3, 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 following e-mail address info@blockchain-sandbox.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-21368.