



EUROPEAN INNOVATION COUNCIL AND SMEs EXECUTIVE AGENCY (EISMEA)

EISMEA.I – Innovation ecosystems, SMP/Entrepreneurship & Consumers
I.02-2 – SME/COSME PILAR

Data Protection Notice for SME Policy Outreach Activities, in Particular, Organisation of SME Assembly, SME Week and European Enterprise Promotion Awards

Your personal data is processed in accordance with Regulation (EU) No 2018/1725¹ on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

The data controllers of the processing operations are:

- Head of Unit I.02 (SMP/COSME Pillar) of the European Innovation Council and SMEs Executive Agency (EISMEA);
- Head of Unit of A.2 (SMEs) of Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) of the European Commission.

The following **entities process** your personal data on our behalf: 1) LOW Associates Brussels SRL, Rue de la Longue Haie, 63, Boite 1, 1000 Brussels, Belgium, functional mailbox: privacy@loweurope.eu; 2) GOPA Com S.A., Boulevard de la Woluwe 2, 1150 Brussels, Belgium; 3) Abbitt Meeting Innovators, Rouwbergskens 8, 2340 Beerse, Belgium; 4) Translate Plus Bulgaria OOD, 85-87 Todor Alexandrov Boulevard, 1303 Sofia, Bulgaria; 5) CoCreative Flow, Sabine Soeder, Mauerweg 4, D - 61440 Oberursel; 6) Blendology, Blaid House, 6 Broad Street, Great Cambourne, Cambridgeshire, CB23 6HJ, the United Kingdom; 7) SiliconHagenAps, Fredriks Bajers Vej 300, 9000 Aalborg, Denmark.

The legal basis for the processing activities are:

- *Article 5(1)(a) of Regulation (EU) 2018/1725 because 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)² laid down in Union law;*
- *Article 5(1)(d) of Regulation (EU) 2018/1725 based on your explicit prior consent for your non-mandatory personal data indicated below; - etc.].*

The purpose(s) of this processing are to:

- To manage your subscription to the SME Week newsletter;

¹ 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L295/39 of 21.11.2018).

² *EISMEA Establishment Act*: Commission Implementing Decision (EU) [2021/173](#) of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the **European Innovation Council and SMEs Executive Agency**, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU (OJ L 50/9 of 15.2.2021) and Regulation (EU) No 1287/2013 of the European Parliament and of the Council of 11 December 2013 establishing a Programme for the Competitiveness of the Enterprises and small and medium-sized enterprises (hereafter "COSME") (2014-2020) and repealing Decision No 1639/2006/EC.

- To send other type of communications/email alerts/app updates (with articles, reports, interviews, visual content, surveys) related to SME Assembly, SME Week and European Enterprise Promotion Awards (EEPA);
- To invite you to attend the SME Assembly and other related events as a speaker or a delegate/participant and provide all type of pre/during/post event communications related to these events as well as follow-up communications;
- To invite you to join and manage your participation in selected related communities/ groups, for instance EEPA Alumni Network;
- To manage your application for SME Week Youth Essay Competition;
- To manage all aspects of the European Enterprise Promotion Awards (EEPA), including but not limited to application and selection process, as well as compiling and sharing your contact details in the EEPA Compendium;
- To publish your details on the EC website database of good practice and Promoting Enterprise Blogpost in order to promote yourself/your project with examples of good practice.

The following of your personal data are collected:

- SME Week Newsletter: first name, last name, company, e-mail;
- Other type of communications/email alerts/app updates: title/prefix, first name, last name, e-mail; job title, company name;
- Invitations to events: title/prefix, first name, last name, e-mail; job title, company name;
- Participation in selected related communities/ groups: title/prefix, first name, last name, e-mail; job title, company name;
- Youth Essay Competition Applications: first name, last name, e-mail address, telephone number, date of birth, country,
- European Enterprise Promotion Awards: first name, last name, job title, title/function, project name, organisation name, e-mail, phone number, website address, town and country, pictures/photos, logos and short bios.
- EC website database of good practice and Promoting Enterprise Blogpost: title/prefix, first name, last name, e-mail; job title, company name.

All personal data are **mandatory** for the purpose(s) outlined above.

In addition, the following **non-mandatory** personal data may be collected: work address, work phone, mobile phone, twitter handle, Facebook profile; Instagram account; short biography; picture; and can only be processed based on your explicit prior consent.

The recipients of your personal data will be authorised EISMEA and Commission staff in charge of SME Assembly, SME Week and European Enterprise Promotion Awards activities, authorised staff of Agency or Commission contractors. Your personal data may also be shared with bodies in charge of monitoring or inspection tasks in application of Union or national law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF), law enforcement bodies). Lastly, some of your personal data might be made available to the general public for the promotion purposes, in particular:

- Youth Essay Competition: your first name, last name, country, photo and short biography;

- EEPA Compendium: your first name, last name, country, email address;
- EC website database of good practice and Promoting Enterprise Blogpost: first name, last name, e-email; job title, company name, picture/photo;
- SME Assembly event /EEPA Ceremony participation: your first name, last name, job title, company name, picture/photo, recording image or voice.

Your personal data **will not be transferred** to third countries or international organisations. However, please note that we use third-party tools (listed below) with their own privacy policies, which you are strongly suggested to read carefully.

The processing of your data will **not include automated decision-making** (such as profiling).

Your personal data will be kept for a maximum period of 5 years after the end of the project. Data will be deleted at the end of this period.

You have the right to access your personal data and to request your personal data to be rectified, if the data is inaccurate or incomplete; where applicable, you have the right to request restriction or to object to processing, to request a copy or erasure of your personal data held by the data controller. If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**.

Your right to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the **applicable [Restriction Decision](#)** in accordance with Article 25 of Regulation (EU) 2018/1725.

If you have **any queries** concerning the processing of your personal data, you may address them to Head of Unit I.02 (SMP/COSME Pillar) of EISMEA and Head of Unit of A.2 (SMEs) of DG GROW (entity acting as data controller) via smeassembly@loweurope.eu.

You shall have the right of recourse at any time to the EISMEA Data Protection Officer at EISMEA-DPO@ec.europa.eu or to the DATA Protection Officer of the European Commission at DATA-PROTECTION-OFFICER@ec.europa.eu and to the European Data Protection Supervisor at <https://edps.europa.eu>.

Third party tools

Swapcard

Swapcard, a third party tool, is used as the project and event app, and is managed by LOW and above entities. The privacy policy can be found here: <https://www.swapcard.com/privacy-policy>

MailerLite

For the purpose of sending newsletters, notifications and alerts from the web platform MailerLite, a third-party tool under LOW's and GOPA's responsibility, collects name, email address, organisation and other relevant information for tailored marketing content. All marketing will be strictly opt-in only. MailerLite's GDPR statements can be found here: <https://www.mailerlite.com/gdpr-compliance>

Meltwater

To analyse media channels and traffic and improving the communications activities, Meltwater, a third-party tool under GOPA's responsibility, is used. Meltwater's privacy policy can be found here: <https://www.meltwater.com/en/privacy>

Airtable

For the purpose of managing the project, Airtable, a third-party tool under LOW's responsibility, processes email addresses, IP address and cookies. Airtable's privacy policy can be found here: <https://www.airtable.com/privacy>

Teams (Microsoft)

For the purpose of coordinating discussions between the client, contractors, subcontractors, experts and stakeholders Teams, a third-party tool managed by LOW and above entities collects personal data including email addresses. Teams' privacy policy statement can be found here: <https://privacy.microsoft.com/en-us/privacystatement>

LinkedIn

To enable delegates, EIPA Alumni members to connect, discuss and share ideas, LinkedIn Groups, a third-party tool managed by LOW and above entities, collects personal data including email addresses. LinkedIn's privacy policy can be found here: <https://www.linkedin.com/legal/privacy-policy>

Twitter

To raise awareness and promote the project activities, Twitter, a third-party tool is used and is managed by GOPA. Twitter Privacy Policy can be found here: <https://twitter.com/en/privacy>

Facebook

Facebook is used for information/promotion purposes only and is managed by GOPA. Facebook Privacy Policy can be found here: <https://www.facebook.com/about/privacy/previous>

Instagram

Instagram is used for information/promotion purposes only and is managed by GOPA. Instagram's Privacy Policy can be found here: https://help.instagram.com/519522125107875/?maybe_redirect_pol=0

Wordpress

A third-party tool, Wordpress, is used for the EC website database of good practice and Promoting Enterprise Blogpost and is managed by GOPA. The privacy statement can be accessed here: <https://automattic.com/privacy/>

Flickr

A third-party tool, Flickr, is used to share the photos from the events and is managed by GOPA. The privacy statement can be accessed here: <https://www.flickr.com/help/privacy>

Canva

A third-party tool, Canva, is used to carry out design/editing tasks for the promotion purposes of the project, and is managed by GOPA. The privacy statement can be accessed here: <https://www.canva.com/policies/privacy-policy/>

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