

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** Sustainable Mobility JRC Seville site Pilot Project

**Data Controller:** DG JRC/ JRC DIR B

**Record reference:** DPR-EC-00592

### **Table of Contents**

- 1. Introduction**
- 2. Why and how do we collect your personal data?**
- 3. On what legal ground(s) your personal data is processed and by who?**
- 4. Which personal data do we collect and it is further processed and by who?**
- 5. How long your personal data is kept?**
- 6. How your personal data is protected and safeguarded?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

## **1. Introduction**

The European Commission (hereafter "the Commission") is committed to protect your personal data and to respect 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 by who, 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 contact in case you decide exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation related to the "JRC Seville site Sustainable Mobility Pilot Project", an initiative to promote sustainable means of transport in JRC Seville site, undertaken by the JRC Directorate B - Growth and Innovation is presented below.

## **2. Why and how do we collect your personal data?**

### Purpose of the processing operation:

The JRC Seville site Sustainable Mobility Pilot Project is an initiative in the framework of the EMAS (Echo-management audit scheme) and the Commission Decision C (2013) 7708 of 18/11/2013 on the application by the Commission services of the Community eco-management and audit scheme (EMAS).

As an EMAS registered site within the Commission EMAS register, the JRC Seville site intends with this initiative to promote the use of sustainable means of transport among the JRC Seville staff, hereinafter the data subjects, in their daily commuting to and from the workplace aimed to reducing the overall CO2 footprint. To that end, The JRC Seville site has purchased an annual license to use a mobility tool provided by the external contractor Ciclogreen Move and Win SL (hereinafter Ciclogreen) .

Ciclogreen provides an easy-to-use online reward system (web + app) to promote and analyze sustainable mobility practices in companies, helping its customers to achieve the objectives of their sustainable mobility plans and get healthier and more productive employees.

In this context, Ciclogreen offers the JRC Seville site a customized online reward programme (annual license of use of a customized version of its platform and App) that will allow motivating its staff to shift to more sustainable means of transport in their daily commuting to and from the workplace and to analyse data related to their mobility patterns.

To that aim, the domain <https://sustainable.jrc.es> has been created enabling you to conclude the sign up process and download the Ciclogreen App in your mobile phone, to start registering your daily commuting to and from the workplace by clicking in the App the "play" button to participate in the mobility challenges proposed by Ciclogreen and opt to exchange those accumulated sustainable km by an specific prize offered for each challenge. As your itineraries covered are tracked by Ciclogreen by means of a GPS geolocator, you will have to allow Ciclogreen to get access to your location as explained in the Ciclogreen Privacy Policy.

Aimed to reward only trips to and from the workplace, Ciclogreen will create a virtual distance buffer of 500 metres around the JRC Seville site (Expo Building).

However, as the domain <https://sustainable.jrc.es> will aim to the Ciclogreen website, all your personal data introduced in the registration process, and that related to your mobility patterns to and from the workplace, will be stored, used and automatically processed by Ciclogreen as explained in the terms and conditions contained in its Legal notice and particular conditions of registration and its Privacy Policy, which complies with the Personal Data Protection National Legislation "Ley Orgánica 3/2018, de 5 de Diciembre, de Protección de Datos Personales y garantía de los derechos digitales", which implement the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In this context, the JRC Seville site EMAS Coordinator, as part of the JRC Directorate B - Growth and Innovation, will be the responsible of the domain <https://sustainable.jrc.es>.

After having completed the sign up process, you will be requested to complete your personal profile by optionally providing some additional data such as your name or nickname, surname and address, and finally you will be able to download in your mobile phone the Ciclogreen APP and start participating in those sustainable mobility challenges proposed by Ciclogreen and applying for the rewards offered.

The JRC Seville EMAS site Coordinator will have access through a dedicated control panel to different anonymised data for CO2 footprint related data reporting and statistics purposes.

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

### **3. On what legal ground(s) is processed and by who?**

We collect your personal data and it is processed by Ciclogreen, because you have given your specific consent to this processing.

Participation of the data subjects is voluntary Art. 5(d) of Regulation (EU) 2018/1725.

You, in the course of the registration process in the domain <https://sustainable.jrc.es>, will encounter different tick boxes, and will be encouraged to carefully read and accept the content of the following documents:

- this Privacy Statement,
- Ciclogreen Privacy Statement
- Ciclogreen Legal Policy and Terms and conditions,
- Ciclogreen Cookies Policy

in order to successfully conclude the sign up process.

It will be likewise asked your consent for anonymous travel data to be used to conduct studies to improve sustainable mobility in cities.

You will have access either via the website or the App, to different real time information such as:

- Ranking of participants
- Name of participants (should they consent to it) or nickname instead.
- Sustainable Km covered
- Means of transport used

- CO2 commuting footprint
- Most frequent itineraries
- Heat Maps

#### **4. Which personal data do we collect and it is further processed and by who?**

If you desire to participate in this initiative will have to conclude the sign up process by providing the following data:

- E-mail
- Password
- Date of birth
- Gender (male/female)

Ciclogreen will manage and will process the data collected in the sign up process and that related to the mobility activity registered by you in the Ciclogreen App.

The JRC Seville EMAS site Coordinator will have access through a dedicated control panel to different anonymised data for CO2 footprint related data reporting and statistics purposes. Mainly:

- Ranking of participants
- Name of participants (should they consent to it) or nickname.
- Sustainable Km covered
- Means of transport used
- CO2 commuting footprint
- Most frequent itineraries
- Heat Maps

#### **5. How long do we keep your personal data is kept?**

Ciclogreen will keep your personal data for the initially envisaged duration of the pilot project which will finalise on December 31<sup>st</sup> 2019.

However, if the initiative is considered to have been successful and there has been a high rate of data subjects throughout the year, the project might be extended to all the JRC and the Commission, and in that case your consent will be requested.

If for any reasons the project does not go further the 31<sup>st</sup> December, the data subject will be duly informed and your subscription to Ciclogreen will be automatically cancelled, unless you decide to actively accept to continue in their database.

#### **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 in the Ciclogreen servers and used and processed likewise by Ciclogreen, only and exclusively for CO2 footprint related data reporting and statistics purposes.

The JRC Seville EMAS site Coordinator will have access through a dedicated control panel to different **anonymised data** for CO2 footprint related data reporting and statistics purposes.

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. Real Decreto-ley 12/2018, de 7 de septiembre, de seguridad de las redes y sistemas de información.

Ciclogreen is 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 implementation of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679), as stated in the Ciclogreen Privacy Statement and the Ciclogreen Legal Policy and Terms and conditions.

Ciclogreen guarantees the privacy and anonymity of all the data provided by you and that related to your mobility patterns as stated in its Legal notice and particular conditions of registration, its Privacy statement and its Cookies Policies.

In order to protect your personal data, Ciclogreen has put in place the below mentioned 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 for the purposes of this processing operation.

- Ciclogreen staff up-to-date on their duties and obligations regarding personal data protection.
- Access control system to information through unambiguous and robust identifiers, with access profiles which are changed periodically.
- Access control system to gain access to the Ciclogreen facilities.
- Antivirus security software
- Support management procedure
- Backup procedure
- Encryption procedure for communications and portable terminals
- Procedure for periodic controls/audits/impact assessments
- Procedure for processing, filing and storing paper documentation
- Employees trained in data protection
- Confidentiality agreement signed by employees involved in data processing.
- Provision and appointment of Data Protection Officer
- Security incident management system, including procedure for communicating security breaches to the interested party/responsible party.
- Registration of Processing Activities
- Subcontracting procedure, including evaluation of the subcontractor and contract.
- Procedure for making interested parties aware of their rights

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

All your data will be stored, used and processed by Ciclogreen exclusively for the purposes described in this document.

You may find further details and information in terms and conditions described in Ciclogreen's Legal notice and particular conditions of registration and Privacy Policy, which comply with Data Protection National Legislation "Ley Orgánica 3/2018, de 5 de Diciembre, de Protección de Datos Personales y garantía de los derechos digitales" (The national implementation of GDPR' Regulation (EU) 2016/679).

Ciclogreen will manage your personal data, related to your commuting to and from the workplace for carrying out this processing operation. The JRC Seville site EMAS coordinator according to the "need to know" principle will have access only to anonymised data related to mobility patterns. Both abide by confidentiality agreements.

Ciclogreen is accessible via the social networks facebook, Instagram, Twiter, Google + and LinkedIn, having all of them their own cookies Policy.

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.

### **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, rectify or erase your personal data and the right to restrict the processing of your personal data. You also have the right to object to the processing and the right to data portability.

You may exercise at any time your rights for access, rectification, suppression, opposition, limit the treatment by writing to [info@ciclogreen.com](mailto:info@ciclogreen.com). You may find further details and information in Ciclogreen Privacy Policy.

You can also exercise your rights by contacting JRC Seville site EMAS Coordinator at [JRC-SEVILLE-ENVIRONMENT@ec.europa.eu](mailto:JRC-SEVILLE-ENVIRONMENT@ec.europa.eu), 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.

You have consented to provide your personal data to JRC Directorate B - Growth and Innovation for the present processing operation. You can withdraw your consent at any time by writing to [info@ciclogreen.com](mailto:info@ciclogreen.com). You may find further details and more information in Ciclogreen Privacy Policy. To this respect, the JRC Seville site EMAS Coordinator will ensure that the User's will is satisfied by Ciclogreen.

### **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 JRC Seville site EMAS Coordinator [JRC-SEVILLE-ENVIRONMENT@ec.europa.eu](mailto:JRC-SEVILLE-ENVIRONMENT@ec.europa.eu).

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

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto: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](mailto: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-00592.