



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** Information Platform for Chemical Monitoring (IPCHEM)

**Data Controller:** JRC.F.3

**Record reference:** DPR-EC-00213

### **Table of Contents**

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 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 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 “Information Platform for Chemical Monitoring (IPCHEM)” undertaken by JRC.F.3 is presented below.

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

Purpose of the processing operation: JRC.F.3 collects and uses your personal information to maintain and develop the IPCHEM platform. IPCHEM is an information platform, developed and managed by the JRC, under mandate of DG ENV. It provides access to chemical monitoring data, collected and owned by different European and National institutions and research organisations. IPCHEM promotes a more coherent approach to the generation, collection, storage and use of chemical monitoring data in relation to humans and the environment, through the creation of a platform for chemical monitoring data, as requested to the Commission by the COM (2012) 252. This would help identify links between exposure and epidemiological data in order to explore potential biological effects and lead to improved health outcomes.

IPCHEM is developed as a collaborative platform among the European Commission Services (ENV, SANTE, RTD, GROW, EMPL and JRC) and EU Agencies (EEA, ECHA, EFSA). DG ENV ensures coordination and decision making with other services on the scope, direction and possible functionalities for IPCHEM. The JRC is responsible for the scientific coordination and technical design and development of IPCHEM, for its maintenance and operation and for data handling and integration into IPCHEM.

The platform allows access to:

- a) Data collections containing chemical concentration values collected in different media (soil, water, air, products, food, feed, humans) and
- b) Metadata pages where general information for each data collection is displayed.

To be part of the IPCHEM platform, each Data Controller must compile and sign the IPCHEM Participation Form, annexed to the IPCHEM Data Policy and subsequently provide it to the JRC-IPCHEM team.

The provision and publication in IPCHEM of the metadata is mandatory; and in both cases it is the data provider that decides the access conditions of their data through IPCHEM.

The data collections are classified according to 4 thematic modules:

- 1) Environmental monitoring data,

- 2) Human Biomonitoring data,
- 3) Food and Feed monitoring data,
- 4) Products and Indoor air monitoring data

For the IPCHEM modules 1, 3 and 4 (Environmental, Food and Feed and Products and Indoor air monitoring data respectively) the data submitted to the JRC IPCHEM team is anonymised data.

For IPCHEM module 2 Human Biomonitoring data, the data submitted to the JRC IPCHEM team can be anonymised or pseudonymised.

Pseudonymised data means personal data that can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Only for this specific data collection, pseudonymised Human Biomonitoring (HBM) data, the JRC IPCHEM team will proceed as joint controller with the HBM data provider (e.g. HBM4EU consortium partner), controllers of the pseudonymised data and responsible for the safekeeping of the key that could allow the re-identification of the individuals.

The JRC IPCHEM team does not receive this key. Joint controllership agreements according to Article 28 (Regulation (EU) 2018/1725) will be established between the JRC IPCHEM team and the research consortium HBM4EU or any other HBM data provider, to regulate the processing of the data and for hosting the pseudonymised data in the IPCHEM hosting facilities. The HBM data provider directly uploads the data in the hosting facilities and manages the access of authorised users. In the IPCHEM Data Policy (Article 6) it is clearly stated that the JRC IPCHEM team can accept only data which are fully compliant with national ethics and legal requirements and with any exceptional accessibility regimes imposed to the data by the data owner/provider/controller, and based on regulatory or on valid and legitimate contractual obligations. It is the full responsibility of the data owner/provider/controller to be compliant with these requirements and restrictions. This will be ensured in the Joint Controllership Agreement.

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, according to Article 5(1) of Regulation (EU) 2018/1725:

(a) 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 and

(d) you have given consent to the processing of your personal data for one or more specific purposes.

Legal basis:

- Treaty of the EURATOM Chapter I, art. 8: the Commission establishes a Joint Centre for Nuclear Research. (The Joint Research Centre).
- The Communication COM(2012) 252 final from the Commission to the Council "The combination effects of chemicals: Chemical mixtures".

We process **special categories of personal data**, therefore Article 10 of Regulation (EU) 2018/1725 applies. In particular, we process, health data. The "human biomonitoring (HBM) module" of IPCHEM contains data on concentrations of chemicals in human matrices, such as blood, urine, human milk, saliva, hair, teeth, faeces etc. which can be considered "health data". Such HBM data are either aggregated / anonymous or individual level pseudonymised data. The key for re-identification will not be transferred.

We process special categories of personal data indicated in Section 4, because:

(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union law provides that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

(g) the processing is necessary for reasons of substantial public interest, on the basis of Union law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

(i) the processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices, on the basis of Union law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.

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

In order to carry out this processing operation JRC.F.3 collects the following categories of personal data:

Personal data related to all data collections (metadata):

##### **Publicly available**

- Name of the organisation responsible of the data and/or
- Name of the organisation responsible of providing the data
- Point of Contact (s) Name/Surname
- Point of Contact (s) Email address

This Information is publicly available in the IPCHEM metadata web pages to allow the IPCHEM users to contact them.

##### **Restricted access:**

JRC IPCHEM team also collects the user group of the users (based on EU Login access). These groups are:

- EU Commission and EU Agencies
- EU National Bodies
- General Public

- Specific and temporary research project group (expiring at the end of the research project)

The information about the metadata creator is requested in the metadata template but not published in the IPCHEM metadata web pages; the JRC IPCHEM team stores this information to contact them in case a revision/upgrade of the metadata content is needed.

For environmental data:

Although the data collections integrated into IPCHEM do not contain data on the landownership, in practice, it is possible for some data collections, to retrieve data about the land owner via the location where a sample for chemical analysis has been collected: usually a monitoring station that could be retrieved from the IPCHEM via the geographical coordinates of the sampling. The chemical concentration data could be combined, in particular when measuring chemicals in environmental media (e.g. soil, water, air), with the geographic coordinates of the sampling station and represented as point on a map.

For human biomonitoring data,

Data on concentrations of chemicals in human matrices (such as blood, urine, human milk, saliva, hair, teeth, faeces etc.) which can be considered "health data".

Such HBM data are either aggregated / anonymous or individual level pseudonymised data.

Geographical data or location, generalised and usually represented by an area (e.g. a country or a region).

The provision of personal data is not mandatory.

We have obtained your personal data from the data providers of IPCHEM platform (Joint Controllers of this process).

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

JRC.F.3 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for:

- Anonymised or pseudonymised monitoring data: should be kept without a specific end date in the public interest and for statistical purposes. Where applicable, if studies are continued over longer periods, updates of data sets over time are made to ensure accuracy and completeness.
- Pseudonymised Human Biomonitoring data: should be kept for a period specified in the original consent form. If no specific period was mentioned there, data should be stored for 25 years to allow for research into long term trends in exposure and links to diseases. However, if a data provider at the end of a study destroys the key for re-identification, the data can be considered anonymous and no longer pseudonymous. Where applicable, if studies are continued over longer periods, updates of data sets over time are made to ensure accuracy and completeness.
- Metadata (contact details of data providers): can be updated in case of changes and will be kept as long as there is no request to remove the data.

#### **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 European Commission or of the Joint Controllers. 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 Joint Controllers are bound by a specific agreement 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 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.

- Contact details of the Data owner/provider or controller are publicly available in the IPCHEM metadata web pages.
- The access to other personal data is allowed only to authorised staff (i.e. The JRC IPCHEM team) according to the "need to know" principle (different levels of access can be assigned).
- For pseudonymised data, recipients are defined in the joint controller agreements. This is valid also for the JRC IPCHEM team as joint controller for hosting the data.

#### **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. Where applicable, you also have the right to object to the processing or the right to data portability.

##### For the metadata:

If a Joint Controller/data provider, wishes to verify, correct and/or delete personal data he/she must send an email to the JRC-IPCHEM team functional mailbox. You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

##### For the environmental or human biomonitoring data:

If a Joint Controller/data provider, wishes to verify, correct and/or delete personal data he/she must send an email to the JRC-IPCHEM team functional mailbox. You have consented to provide your personal data to the Joint Controllers of this process for the present processing operation. You can withdraw your consent at any time by notifying the specific Joint Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

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:

[jrc-ipchem-support@ec.europa.eu](mailto:jrc-ipchem-support@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-00213 - Information Platform for Chemical Monitoring (IPCHEM).