



## SERN – GDPR COMPLIANCE UPDATE

### BACKGROUND

Following the introduction of GDPR in 2018, a follow-up decision of the Executive Board is necessary to maintain compliance with the General Data Protection Regulation [Regulation (EU) 2016/679]. This is to continue ensuring to its members and all the actors and citizens that SERN operates through, a lawfully, fairly and a transparent collection and procession of personal data. It is worth mentioning that, as GDPR compliance is a process rather than an act, the commitment of SERN will continue over time and the measures to achieve it will be reviewed and updated by the Board when necessary.

### PROCESS

An internal and informal audit has been conducted at and by SERN, in order to determine what kind of data are processed, the purposes of processing, who has access to it, the third parties that have access and what is being done to protect the data. From the audit emerged that SERN processes different categories of data:

- Data of SERN members
- Data of SERN employers
- Data of SERN project partners
- Data of participants at SERN events
- Data of SERN newsletter subscribers
- Data from SERN website

For each one of the above-mentioned categories, has been proved that SERN has the legal justification to collect and process the data (according to one of the six conditions listed in the article 6 of the GDPR).

Secondly, for each category of data it has been determined whether the data are processed directly by SERN or by third parties. According to each case, actions to be taken have been defined to guarantee a correct and secure process and storage of data.

As for data processed directly by SERN, such as data of its members, employers and project partners, SERN undertakes to collect data limited to what is necessary for its specific network and projects activities, to securely store them and to keep them for no longer than is it necessary. All data held by SERN are based on the consent given by the data subjects, who have also the right to withdraw their consent at any time, the right to access, rectification and depending on the case the right of erasure.

The data are processed only by the Secretariat staff when necessary and under no circumstance any kind of data will be transferred to third parties without consent or without a valid motivation. (e.g. in 2018 an email was sent to all the SERN Members to inform them about the new data regulation and ask them the consent to be contacted by SERN, the same strategy will be used with the project partners in case we should store or process personal data for specific project purposes). The only exception applicable to the above categories, concerns the data of employees which are processed also by third parties (Payroll services BK Teamsystem).

Data from subscribers of the SERN newsletter are processed by a third part (Mailchimp), however before subscription, users are clearly informed of the fact and they can unsubscribe at any time.

Regarding the SERN website, as it collects some personal data from its users and uses the so-called “technical” Cookies, a cooky policy and a privacy policy have been developed and adopted, and in



compliance with the GDPR, both are displayed and available for consultation on the website (also a specific email address has been set up and made available on the website for privacy-related issues).

In its future activities, SERN intends to design its operations taking particular account of the principle “data protection by default and by design”.

The legal Representative of the organisation, i.e. the Chair of the Executive Board, is the Data Controller, overseeing that all the Network activities comply with the principles underlying the GDPR. The Data Processor role is assigned to the Network Coordinator who will implement appropriate measures in such a manner that processing will meet the requirements of this Regulation and ensure the protection of the rights of the data subject, also using a specific software for data law compliance (Iubenda). At the same time, awareness of data protection will be built up among all the staff of the Secretariat, also through specific training occur on a regular basis.