



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

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

**Processing operation:** Social Media Use by the European Commission

**Data Controller:** Directorate-General for Communication, Directorate A, Unit A.1.

**Record reference:** DPR-EC-00073

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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 reasons 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.

This privacy statement concerns the processing of personal data by the Commission when managing its social media presence and related communication activities, administered by the Directorate-General for Communication, Unit A.1. (COMM.A.1) and by the units responsible for dealing with processing activities related to the said initiatives in the competent Commission department or service.

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

The purpose of the processing is to facilitate online communication activities lead by the Commission through commonly used social media platforms, and to analyse how social media users react to the EU policies and initiatives. The processing of personal data by the Commission follows user's voluntary registration, which is subject to the terms and conditions of a social media platform in question.

The Commission relies on the third-party providers (e.g. Brandwatch, Vizia, Socialbakers) to aggregate and visualise publicly available data gathered through the social media networks. The aggregated data is used for the communication activities, such as coordinating social media presence, sending e-mails and invitations (this entails the management of contact lists for correspondence), statistical and analytical purposes, as well as the promotion of the Commission's communication campaigns and related activities. That can be achieved through:

- Engaging: interacting with social media users and responding to their queries;
- Advertising: raising awareness about the EU policies and the opportunities for the participation in the EU decision-making process;
- Identifying and collaborating with influencers (defined by reach, number of followers, engagement and topic) who can promote Commission's activities online;
- Reporting and optimisation: analysing performance of posts and improving Commission's online communication and engagement on social media.

The Commission relies on the commonly used social media platforms to publish information about the EU policies, raise awareness about the Commission initiatives and engage directly with citizens by replying to their comments and questions.

It is important to note that the ideas and views expressed by the Commission on social media are for information purposes only. No communication through social media shall be

deemed to constitute legal or official notice on behalf of the Commission. While operating in the social media environment the Commission strives to ensure that adequate and specific safeguards are implemented for the processing of personal data, in line with the applicable data protection legislation.

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

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

We process your personal data, because:

- 1) 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 personal data processing linked to the qualitative media monitoring analysis, including social media, as well as operating and maintenance of the Commission's social media presence are necessary for the performance of the Commission's tasks carried out in the public interest,, as mandated by the treaties, and more specifically Article 5 of TEU, Article 13 TEU and Articles 244-250 TFEU, and in accordance with Article 1 and Article 11 of TEU.

Informing the broad public and qualitative media monitoring, including monitoring and analysis of social media activities is a public service task resulting from the European Commission's own prerogatives at institutional level, as provided for in Article 58 (2) (d) of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012 (OJ L 193, 30.7.2018, p. 1).

- 2) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 5(1)(c) of Regulation (EU) 2018/1725)

The processing is necessary for the purpose of fulfilling contractual obligations stemming from the framework contracts for Software for Innovation, Diversity and Evolution, as well as for the Data Science, concluded between the Commission and its contractors.

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

Depending on the circumstances and, on the social media platform in question, the Commission or its processors may collect and further process the following categories of data:

- 1) Personal data derived from the user profiles:
  - identification data: name and surname, username, user identification, geographical area, age, gender and other personal characteristics such as the marital status, nationality

- professional and educational background: occupation, employment history, academic record etc.
  - online identifiers: device ID, IP address and/or cookie identifier
- 2) Personal data available about users of social media platforms through their networks and connections: engagement, reach and sentiment, comments, shares of users on a specific topic, networks and connections
  - 3) Unsolicited personal data processed via third-party platform, app or a website (connected to social media platform) that may be obtained when a user visits or uses their services
  - 4) Personal data available via audiovisual content that might be published on the social media platforms: information in or about the content provided by a user (e.g. metadata), such as the location of a photo or the date a file was created, voice recordings, video recordings, or an image of a data subject
  - 5) The categories of data processed by the EU Login application are described in the record of DIGIT (DPR-EC-03187)
  - 6) The categories of data processed by Smarp are described in the record of DGCOMM (DPR-EC-02095.1)
  - 7) The categories of data processed via EC audio-visual services are described in the record of DGCOMM (DPR-EC-00074.1)

When you access a Commission website, the Commission receives as an essential technical requirement the IP address and/or the device ID of the device used to access the website.

Without this processing you will not be able to establish a technical connection between your devices and the server infrastructure maintained by the Commission and therefore you will not be able to access the websites of the Commission.

The Data Controller may share aggregate or de-identified information with other Commission Directorates and/or other EU institutions for archiving, scientific research or statistical purposes.

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

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

### *5.1. Personal data derived from the user profiles and related personal data available through users' networks and connections (including unsolicited data)*

After initially being processed by the Data Controller or its processors, personal data may be stored for a maximum period of 5 (five) years or, until a user deletes a social media account. Only aggregated and numeric values for performance measurement will be stored by the Data Controller in order to preserve capability to provide intra-mandate reports.

Please be advised that the retention period is only an estimate and, it may vary depending on the nature of the data, why it is collected and processed, and relevant retention requirements prescribed by law.

### *5.2. Personal data available via audio-visual content*

Selected audiovisual content may be archived for permanent preservation, in line with the provisions of the Common Commission Level Retention List (SEC(2019)900/2), for historical purposes to document, preserve and make available the history and audio-visual heritage of the Commission and the European Union.

### *5.3. Reports, paper and electronic records, including ARES records kept by DG COM*

All paper and electronic records concerning the day-to-day correspondence, calls for proposals and/or interest together with the resulting contractual/financial files as well as reports containing aggregated data will be archived according to the Common Commission Level Retention List (SEC(2019)900/2) and stored in ARES (Advanced Records System) under the responsibility of Secretariat-General (see Notification DPO-1530.4) for a period of 10 (ten) years with the application of sampling and selection techniques.

## 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 either on the servers of the European Commission (located on the premises of the Directorate-General in Brussels and in the DGDIGIT datacentre in Luxembourg), or of its contractors, all inside the EU. 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 Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the Commission, and by the confidentiality obligations deriving from the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).

In order to protect your personal data, the Commission has put in place a number of 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 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 authorised personnel of the EU institutions and its contractors responsible for carrying out this processing operation according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Authorised staff of the Directorate-General for Communication responsible for qualitative media monitoring and social media presence of the Commission have access to the aggregated data provided by the users of social media platforms and related personal data available through their networks and connections, including any additional information published on a website or on a third-party platform that is being analysed.

The external service providers, including contractors under the framework Contract have access to the personal data derived from the user profiles and related personal data available through users' networks and connections for the purpose of performing their contractual obligations with respect to the Commission. That includes any related information published on a website or on a third-party platform that is being analysed as well as to the parts of volume of coverage related to the EU or to their campaigns. For outreach actions with influencers by different services of the European Commission, the need to share data about the influencers' reach, engagement, or the number of posts is required.

### **7.1. Third party IT tools & Social Media platforms**

For statistical and analytical purposes, the Commission collects and analyses aggregated data about the relevant users of social media platforms. In order to gather and visualise aggregated data for statistical research, the Commission relies on the GDPR-compliant media monitoring tools, which produce the reports and analyse aggregated data from the Commission's corporate social media channels (e.g. [Brandwatch](#), [Vizia](#), [Socialbackers](#)). Only information that is publicly available will be processed and analysed (that may include, the data from public posts by social media users on different social media channels, including forums, blogs and news).

Furthermore, the Commission may use third party IT tools to inform about and promote the EU's activities through widely used communication channels.

For example, you may be able to watch our videos, which may be also uploaded to one of our social media pages and follow links from our website to other relevant social media.

In order to protect your privacy, our use of third party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or "play" on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content, a message will alert you that you need to accept those third parties' specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users carefully read the relevant privacy policies of the social media tools used. These explain each company's policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

The use of a third party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

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. As regards this processing operation, you can exercise the following rights:

- the right to access your personal data (Article 17 of Regulation (EU) 2018/1725);
- the right to rectification in the case that your personal data is inaccurate or incomplete (Article 18 of Regulation (EU) 2018/1725);
- the right to erasure of your personal data (Article 19 of Regulation (EU) 2018/1725);
- where applicable, the right to restrict the processing of your personal data (Article 20 of Regulation (EU) 2018/1725);
- the right to data portability (Article 22 of Regulation (EU) 2018/1725);
- and the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

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. The contact information can be found under Section 9.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. Record reference(s) as specified under Section 10) 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, Directorate-General for Communication, Unit A.1. ([COMM-SOCIAL-MEDIA-TEAM@ec.europa.eu](mailto:COMM-SOCIAL-MEDIA-TEAM@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-00073**