

# EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO

## THE “EUROPE DAY” QUIZ

BY THE EEAS AND EU DELEGATIONS

### 1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS) including the Delegations of the European Union. You have the right under EU law to be informed when your personal data is processed [collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with [Regulation \(EU\) 2018/1725 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](#), aligned with Regulation (EU) 2016/679, the General Data Protection Regulation.

In this privacy statement you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject. You can also find here the contact details of the responsible data controller, with whom you may exercise your rights, of the data Protection Officer of the EEAS and of the European Data Protection Supervisor.

### 2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The purpose of the present data processing is to manage the online Quiz developed specifically for the EUROPE DAY, a series of activities organised by the EU institutions and bodies to celebrate “peace and unity” in Europe. The Quiz targets all public of different age groups, including younger generations and it puts the European Union and EU achievements, values and benefits into focus for European citizens and worldwide. It is provided on an online platform made available by [Prismic](#), a French-based service provider and managed by the Strategic Communications team of the European External Action Service with the technical assistance of [NTT Data](#), Belgium. The processing of personal data is based on voluntary registration. Data is collected in order to facilitate the management and technical functionalities of the quiz as well as to contact you if you have won any prize, applicable in certain EU Delegations. If you give your consent to be contacted by e-mail, the data will be processed also to be able for you to receive a feedback with your results and share it on social networks of your preference. You can also share the quiz itself without giving any personal data to the EEAS. Your attention is drawn to the fact that when you use your own social network accounts, such as Facebook or Twitter, you leave our site and you are redirected to external sites. Giving data, including your name, e-mail, age-range, occupation is entirely optional and these data will only be used to prepare anonymous statistics about the correlation of the results with these characteristics of respondents.

Matomo Analytics (<https://matomo.org/>) is used to analyse the performance of the site, for more information, please see the privacy policy of Matomo: <https://matomo.org/docs/privacy/>

### 3. DATA PROCESSED: What data do we process?

For the above mentioned purposes the following data name, e-mail address, age-range, occupation may be collected.

If you decide to provide your name and email address, the data could only be used by the EEAS or EU Delegations to allow the EEAS to contact you as detailed above. Your full name is not required, you can choose to provide any name or alias. Your replies to the questions are collected and processed to evaluate your score and communicate it to you if you gave your consent. Further optional data needed for statistical purposes are: age group and occupation. The Quiz can be also submitted anonymously, without providing your name and e-mail address.

You also have the option to click on a link leading to the EEAS website, where you can subscribe to our newsletters to receive further information about the European Union, in particular on the activities of the EEAS and of EU Delegations. Please note that you will be redirected to our subscription pages. If you opt-in to receive further information, we collect and process only the data that is necessary for further contacting (primarily your e-mail address).

The Data Controller may share anonymous statistics with other EU institutions or third parties for archiving or statistical purposes.

### 4. DATA CONTROLLER: Who is entrusted with processing your data?

The data controller determining the purpose and the means of the processing activity is the European External Action Service.

The representative of the controller, that is the service responsible for managing the personal data processing under the supervision of the Head of Division is the following entity:

**EEAS Division ‘Global Communications and Public Diplomacy’, SG.STRAT.2**

## 5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

Access to your personal data is provided to the authorised personnel of the EEAS, EU Delegation, EU institutions and the contractors responsible for carrying out the processing operation according to the "need to know" principle. Such staff and contractors abide by statutory or contractual obligation of confidentiality.

Authorised staff of the EEAS have access to the personal data provided by a user in order to perform related follow-up actions.

Access to data is granted, in particular to the following entities:

- Assigned staff members of the Strategic Communications 1 (EEAS.SG.STRAT.1) and of the Directorate Strategic Communications and Foresight
- Assigned staff members of EU Delegations (including Press and Information or Administration sections)
- Assigned staff of NTT Data, Rue de Spa 8, B-1000 Brussels, Belgium (<https://benelux.nttdata.com/about-us>)
- Assigned staff for PRISMIC, 9 rue de la Pierre Levée 75011 PARIS, France (<https://prismic.io/legal/privacy>)

Personal data is not intended to be transferred to a third country or an international organisation.

## 6. ACCESS, RECTIFICATION, ERASURE OF DATA: What rights do you have?

You have the right of access to your personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. If you send a request to the service provider, the contractor will manage the request and keeps a log to provide it to the EEAS on demand. For more detailed legal references, you can find information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. If you would like to exercise your rights or have questions concerning the processing of your personal data, you may address them to the Data Controller via the functional mailbox:

**STRATEGIC-COMMUNICATIONS@eeas.europa.eu**

## 7. LEGAL BASIS: On what grounds we collect your data?

The Union's aims in its external relations are defined in Article 3(5) the Lisbon Treaty as follows: In its relations with the wider world, the Union shall uphold and promote its values and interests and contribute to the protection of its citizens. It shall contribute to peace, security, the sustainable development of the Earth, solidarity and mutual respect among peoples, free and fair trade, eradication of poverty and the protection of human rights, in particular the rights of the child, as well as to the strict observance and the development of international law, including respect for the principles of the United Nations Charter. In order for the EEAS and EU Delegations to be able to promote useful, interesting and fun information about the European Union a limited number of personal data needs to be processed (please see the details under point 3). For the management and technical functionality of the quiz and to prepare subsequently anonymous statistics personal data processing is necessary for the performance of a task carried out in the public interest (Article 5(1)(a) of Regulation (EU) 2018/17285).

If you consent to provide your e-mail and name for processing by the EEAS/EU Delegations for the purpose of sending you your quiz results or for any other specific purpose, the processing is lawful under Article 5.1 (d) of Regulation (EU) 2018/1725. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. Further legal reference:

- [Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS \(2010/427/EU\) OJ L 201, 3/8/2010, p. 30.](#)
- The Lisbon Treaty (consolidated version), The Treaty on the European Union, Article 2, *EU Official Journal* 83/17, 30 March 2010.

## 8. TIME LIMIT - DATA STORING: For what period and how we process your data?

**Storage period:** Personal data is kept for as long as follow-up actions are necessary with regard to the purposes of the processing of personal data. **Data is intended to be kept for a maximum of two (2) years by the EEAS/EU Delegations related to the management and functionality of the quiz.** Data will be kept no longer, than seven (7) years by the service provider from the date of submission of the data in line with the audit record keeping obligations of the framework contract binding the contractor. The EEAS contractors, NTT Data Belgium and PRISMIC (see also Point 5) are bound by a specific contractual clause for any processing operations of personal data on behalf of the EEAS, and by the confidentiality obligations deriving from the [Regulation 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).

**Security Measures:** Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Technical measures include appropriate actions to address online security and to prevent unauthorised entities from access, alteration, deletion, disclosure of data. The collected personal data are stored on servers that abide by pertinent security rules. 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. Data is therefore processed by assigned staff members and access to specific files requires authorisation. General access to personal data is only possible to recipients with a UserID/Password. Physical copies of personal data are stored in a properly secured manner.

## 9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?

If you have enquiries you can also contact the EEAS Data Protection Officer at [data-protection@eeas.europa.eu](mailto:data-protection@eeas.europa.eu).

## 10. RECOURSE

You have, at any time, the right to have recourse to the European Data Protection Supervisor at [edps@edps.europa.eu](mailto:edps@edps.europa.eu).