

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO CAMPAIGNS AND OTHER PROMOTION ACTIVITIES BY THE EEAS AND EU DELEGATIONS VIA CONTENT CREATORS, INCLUDING INFLUENCERS AND INTERMEDIARIES ON SOCIAL MEDIA PLATFORMS

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS), including the Union Delegations. You have the right under EU law to be informed when your personal data is processed [e.g. 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 [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 Data Protection Notice you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject.

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

The purpose of the social media activities is to ensure promoting EU values and disseminate information among the widest range of public, actively involving various groups of society using a number of social media platforms. This permits to engage individuals and reaches users of various platforms. The aim of these campaigns is to expand the overall scope, knowledge and impact around various topics of interest to the public. Certain events and anniversaries create a unique opportunity for this. *In order to do so, a list of content creators of social media, including influencers and intermediaries (social media content creators) are generated by the platforms. If you are a content creator in one or more social media platforms, the site processes your personal data, such as your username, focus of interest, and communicates data to so-called 'targeters' who are interested to communicate to users of social media platforms.*

Description of the processing: These awareness campaigns are rolled out bottom-up through videos, photos or other creative content posted on the platforms, including Instagram, Facebook, TikTok, Twitter, LinkedIn or others. The EEAS receives a list of content creators of the various social media platforms. The content creators inspire others to share content, occasionally modified or complemented. Users of the platforms learn about the content of the campaign through the content creators or from other users and contribute to distribute the messages among contacts and peers. EU Delegations may get in contact with local content creators through their social media account or pre-established contact channels to reach out to the public through local contacts who could be participants at social media or public events organised by EU Delegations. The EEAS or the EU Delegations may also contact other users through their social media account or prior-used contact means to ask them to endorse sharing their content through the EEAS or EU Delegation social media channels.

3. DATA PROCESSED: What data do we process?

The data, including personal data, which may be processed for that purpose are the following:

- Username (avatar names and/or real names)
- Nationality
- Age
- Contact data (Content creators and users are primarily contacted via their social media profiles. In Delegations former contacts could be followed up using pre-established contact channels)
- Interest in specific topics, domains
- Promotion material, including videos, communicated for further sharing
- Information about accounts, such as profile name, age, number of followers in different social media channels and potential reach/pick-up of posts.

Material shared in social media if the content creators or users give their consent to use it in the communication activities of the EEAS/EU Delegations on social media.

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 (EEAS). The EEAS Directorate entrusted with managing the personal data processing under the supervision of the Head of Division is the following organisational entity:

EEAS Strategic Communications 2: Global Communications and Public Diplomacy Division
EEAS.GII.GLOBAL.STRAT.2
STRATEGIC-COMMUNICATIONS@eeas.europa.eu

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

The recipients of your data may be

- Designated staff of the EEAS, including Strategic Communications, i.e. Social Media - Digital Communications
- Assigned staff of other EU institutions and other assigned organiser team members, if required
- Security and other partners, contractors, service providers on behalf of the organiser

With the exception of public domain data, no personal data is transmitted to third countries or to international organisations, which are outside the recipients and the legal framework mentioned.

Data will not be shared with third parties for direct marketing. Under certain conditions outlined in law, we may disclose your information to third parties, (such as the European Anti-Fraud Office, the Court of Auditors, or law enforcement authorities) if it is necessary and proportionate for lawful, specific purposes. Service providers will process data on documented instructions and on behalf of the EEAS/EU Delegation in accordance with Article 29 of Regulation (EU) 2018/1725. More information on how the provider processes personal data is available on the website of the contracted organisation. Data will not be communicated to third parties, except where necessary for the purposes outlined above.

Social Media: The EEAS and EU Delegations use social media to promote EU values and disseminate information among the widest range of public through widely used contemporary channels. Your use of social media implies that the providers of social media channels, which may be located in countries outside the scope of the EU data protection legal framework, process your personal data you share according to their own privacy policies. We recommend that you read the relevant privacy policies, (for example [X](#), [Facebook](#), [Instagram](#), [YouTube](#)) which explain their data processing terms, data use, users' rights and the way how users can protect their privacy when using these services.

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

You have the right of access to your personal data, the right to correct your inaccurate or incomplete personal data or have your data erased taking into account the purpose of the processing. The right of rectification can only apply to factual data processed. 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 wish 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?

Lawfulness

The processing of personal data of content creators, intermediaries and users providing material to the EEAS in the context of social media campaigns in order to promote European values is necessary for the performance of a task carried out in the public interest [Article 5(1)(a) of Regulation (EU) 2018/1725], as mandated by the Treaties, in particular by articles 5, 11, 20, 21-40, 42, 43 of the Treaty on European Union (TEU) and 2 (4) and (5), 205, 220-221, 326 – 334 of the Treaty on the Functioning of the European Union (TFEU), specifically **to enable enhanced communication with the wider public of various generations as well as cooperation and exchange of information**. Please see related references* below.

The processing of personal data in case you contact the EEAS via social media platforms is based on your consent [Article 5(1)(d) of Regulation (EU) 2018/1725]. By affirmative action of contacting the EEAS you agree to the processing of your personal data for the purpose of responding to your enquiry or comment. You can withdraw consent any time by contacting the data controller at the functional mailboxes under Point 6.

Further reference

EEAS vision for social media Ref. Ares(2016)6738179 - 01/12/2016

Para 6 of Article 9 and Para (3) b of Article 4 of 2010/427/EU: [Council Decision of 26 July 2010 establishing the organisation and functioning of the European External Action Service OJ L 201](#), 3.8.2010, p. 30-40

Shared Vision, Common Action: A Stronger Europe: A Global Strategy for the European Union's Foreign and Security Policy (June 2016): Chapter 1. A Global Strategy to Promote our Citizens' Interests.

8. TIME LIMIT FOR DATA STORED & SECURITY MEASURES: For what period and how we process your data?

Personal data is kept only for the period of time preparing the communication activities, i.e. campaigns.

Data received about content creators only serve the purpose to provide information via the social media platforms presenting the content creators with the promotion material. Data of content creators are not processed for any other purpose.

Security of data: For the limited period while the EEAS or EU Delegations process your personal data, appropriate organisational and technical measures are taken to prevent unauthorised entities from access, alteration, deletion, disclosure of data. Data are stored on servers that abide by pertinent security rules and is processed by assigned staff members. General access to personal data is only possible to recipients with a UserID/Password. In case a service provider is contracted, as a data processor, the collected data may be stored by the external contractor, who has to guarantee data protection and confidentiality required by Reg. (EU) 2018/1725.

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.

10. RECOURSE

You have, at any time, the right to have recourse to the European Data Protection Supervisor at edps@edps.europa.eu.