

# EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO

# **EEAS WEBSITE PAGES ON THE "EUROPA" SITE**

# 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 [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 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.

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

The European External Action Service (EEAS) is the European Union's diplomatic service. It helps the EU's foreign affairs chief – the High Representative for Foreign Affairs and Security Policy – to carry out the Union's Common Foreign and Security Policy. The EEAS works closely with Member States of the EU and the other EU institutions and has a strong working relationship with the United Nations and other International Organisations as well as with third countries. The EU foreign policy and its programmes help to protect EU citizens outside the EU's borders relying on an extensive network of EU diplomatic presence worldwide. The EEAS also provides education & career opportunities and the European Union Delegations play a vital role in representing the EU and its citizens around the globe and building networks and partnerships. The EEAS actively promotes the values and interests of the EU also by means of its website.

The purpose of the present processing activity is to process data necessary to contribute to the visibility of the EU's external action by maintaining the EEAS website on EUROPA Portal enabling to communicate, search for and inform a wide audience about EU's foreign policy efforts and to provide

- timely and accurate information to the public; citizens, businesses and other stakeholders
- easy access to updated, user-friendly and multilingual information material tailored to the users' needs.

#### To be informed and interact with the EEAS, you can:

- give feedback or send enquiries through the <u>EEAS contact page</u>
- submit a petition on foreign policy issues
- take part in public consultations on foreign policy
- read our <u>publications</u> and access the <u>EEAS Register of Public Documents</u>
- request access to EEAS documents that can be made public
- subscribe to <u>newsletters</u>.

This privacy statement covers the EEAS website and the contact form. Although you can browse through most of this website without giving any personal information, for some of the abovelisted interactions, a number of personal data is nonetheless required in order to provide the services or information you request. Services that require such personal information – including requests for access to documents and subscriptions to newsletters – handle personal data in compliance with the data protection regulation for EU institutions. You can find information about the use of your data in the specific privacy statements of these services available in the website section of <a href="Privacy Statements">Privacy Statements - Data Protection Notices</a>.

#### Feedback form, contact buttons and e-mail addresses

Certain EEAS web pages have a contact button or show e-mail addresses, which activate your e-mail software and invite you to send your comments to a specific mailbox. By clicking the "Submit" button on the feedback form, the information provided in the form (see also point 3) will be forwarded to a specific mailbox and the managers of the mailbox will handle your feedback or enquiry.

#### **External sites**

The EEAS and the EU Delegations provide links to third party sites and use social media to promote and inform about events and meetings through widely used and contemporary channels. In addition to the webpages of the EEAS and of other EU institutions, videos may be uploaded to the EEAS YouTube channel and links from our website can appear on Twitter, Instagram, Flickr, LinkedIn and Facebook. The use of social media does not in any way imply endorsement of them or their privacy policies. In order to use third party content on our websites, you may need to accept their specific terms and conditions, including their cookie policies, over which the EEAS has no control. We recommend that you read the Twitter, Flickr, Facebook, Instagram, LinkedIn and YouTube privacy policies which explain their data processing policy, use of data, users' rights and the way how users can protect their privacy when using these services.

#### **Europa Analytics**

Europa Analytics is the corporate service that measures the effectiveness and efficiency of the <u>EUROPA.eu</u> portal managed by the European Commission on behalf of all EU institutions and bodies. You are free to refuse the use of this service – either via the cookie banner that appears at the first page you visit or at <u>Europa Analytics</u>. You are not tracked if your browser is reporting that you do not want to. This is a setting of your browser, therefore you will not be able to opt-in until you disable the 'Do Not Track' feature. Choosing not to use this service does not affect your navigation experience on Europa sites.

The EEAS website uses cookies, tiny files placed on your device to analyse the use of the website. You can find the "Cookies" page <u>here</u>) describes the use of Cookies on the site.

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

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

- Personal data provided by the citizens as required by the contact form on a voluntary basis via the "Contact the EEAS" page:
  - First and last name
  - □ Email address\*
  - Nationality
  - Country of residence
  - Preferred and alternative contact language
  - Enquiry\* free field for you to ask questions or send a feedback
    - \* Data fields (email and enquiry) to be filled in accurately in order to provide you with a reply.
- Personal data as contact details, including name, position and contact data of the Head of Delegation or other Delegation
  personnel, as agreed, under the Delegations' directory and on the dedicated websites of EU Delegations
- Photo Gallery
- Videos
- Features stories and web documentaries
- Personal data on the EEAS web pages and in publications
- Personal data, including identification data, browsing history, contained in the cookies (Please see point 2).

None of the services mentioned collect or process special categories of data falling under Article 10 of the Reg. (EU) 2018/1725, with the exception of the case when such special categories of data might appear on the website, when linked to the public activity of a public figure as data subject (for instance: poilitical affiliation or opinions or ethnic origin of a given public figure representing a specific political group or a minority), manifestly made public by the data subject or when you prvide such data in the free text fields or in your e-mail. It is recommended that you do not provide such sensitive data.

#### 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 Division entrusted with managing the personal data processing under the supervision of the Head of Division is the following organisational entity:

# Communications Policy and Public Diplomacy Division - EEAS.SG.STRAT.1

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

The EEAS website addresses a wide variety of audiences, including citizens, business, press and media, officials in the EU institutions, international organisations, other professionals and stakeholders both in the EU and worldwide.

The recipients of the data appearing on the website are as follows:

- 1. General public visiting the website
- 2. Designated staff members of the EEAS responsible for:
  - 2.1. updating the website (EEAS Communication Policy and Public Diplomacy Division, IT Division, contractor)
  - 2.2. handling data received via dedicated pages mentioned under "<u>To be informed and interact with the EEAS</u>" in Point 2, such as "<u>Access to documents</u>", "<u>Subscription to email and SMS distribution lists</u>", subscription to local or thematic newsletters and newsgroups (CSDP, EU Delegations)
- 3. European Commission services, including DG COMM and contractors as service providers, if concerned by your feedback Such staff abide by statutory, and when required, additional confidentiality agreements. Mandated staff of contractors may be provided with the information necessary to facilitate information requests and to provide required support.

Recipients of the data sent by the contact form or e-mail: When you send a message/request, your personal data is collected only to the extent necessary to provide a reply (concerning the contact form, see point 3). If the management team of the mailbox is unable to answer your question, it will forward your e-mail to another service.

Personal data is not intended to be transferred to a third country or an international organisation. The given information will not be communicated to third parties, except where necessary for the purposes outlined above.

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

You have the right of access to your personal data and the right to correct your inaccurate or incomplete personal data, taking into account the purpose of the processing. 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. 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.

Further information about processing your personal data

- A specific page of the EEAS site contains the links to the privacy statements describing the protection of your personal data (https://www.eeas.europa.eu/eeas/privacy-statements-data-protection-notices\_en).
- Each page of the EEAS site contains a link "Cookies" (https://www.eeas.europa.eu/eeas/cookie-policy\_en) describing the use
  of Cookies on the site.

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:

# WEBSITE@eeas.europa.eu

Communications Policy and Public Diplomacy Division: <a href="mailto:STRATEGIC-COMMUNICATIONS@eeas.europa.eu">STRATEGIC-COMMUNICATIONS@eeas.europa.eu</a>

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

Lawfulness: The processing of your personal data is necessary for the performance of a task carried out by the European External Action Service in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 2018/1725] as referred to in Recital 22 thereof. Further references:

- Action Plan to Improve Communicating Europe by the Commission (COM(2005)985)
- Communication from the Commission: The Commission's contribution to the period of reflection and beyond: Plan-D for Democracy, Dialogue and Debate (COM(2005)494)
- White Paper on a European Communication Policy (COM(2006)35)
- eEurope Action plan: objective 3b (eGovernment) commits the Commission to ensuring "that citizens have easy access to essential public data as well as promoting on-line interaction between citizens and government"
- Reform White Paper: Chapter II/VI "Towards the eCommission" (Actions 7, 8 & 9), in particular Strand 3 "Better Public Service to Citizens and Business
- Europa II: Communication "Towards eCommission: Europa 2nd Generation Advanced web services to citizens, business and other professional users" (C(2001)1753 of 6/7/01)
- Decision by SecGens of 25/1/05
- Decision by Information Resources Management Board (IRMB) 14/7/95 (mandate: cf SEC/91/1127) to set up 'Europa server'
- The Union's information and communication strategy: The Europa site is one of the key instruments in the implementation of the Union's information and communication strategy, as defined in the following Communications:
  - Communication on implementing the information and communication strategy for the EU (COM(2004)196) of 20/4/04
  - Communication from the EC an information and communication strategy for the EU (COM(2002)350) of 2/10/02
  - Communication from the EC on "implementing the information and communication policy for the EU (COM(2004) 196 final of 20/4/04)
- 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. and Code of Good Administrative Behaviour

Processing of data submitted through the contact form or via e-mail is necessary in order to provide you with an answer or a feedback. The processing of optional data or of personal data you voluntarily provide in the free text fields or in your e-mails beyond the necessary content is based on your consent [Article 5(1)(d) of Regulation (EU) 1725/2018]. You can withdraw your consent at any time by contacting the data controller at the above functional mailbox in Point 6. Withdrawal of your consent implies that we cannot follow up the deleted part of your request any longer.

# 8. TIME LIMIT & DATA SECURITY: for what period and how securely do we process your data?

- Personal data are kept as long as needed to serve the purpose for which they have been collected. If not used, personal data will be deleted 3 (three) years from the date of submission of an enquiry. Data concerning feedback or enquiries provided via the contact form or e-mail will be kept as long as the enquiry is answered or the feedback is followed up unless necessary to keep it longer for eventual claims or complaints as well as for quality control.
- Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time including the publication on the EEAS/EU Delegation website and on the EEAS Intranet with appropriate safeguards in place. Archiving 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 individuals. Reports and other material containing personal data are archived according to e-Domec policy.
- In case of an incident, event or enquiry by authorities, data subjects or other concerned individuals' personal data will be preserved as long as the legal claims arising from the investigations expire or any follow-up action is due. This includes pending cases, appeals and court judgments to allow for the exhaustion of all appeal and other channels of legal remedies. In any case, personal data will not be kept longer than 5 years after the judgment on the pending case is final.
- When appropriate, personal data contained in supporting documents should be deleted where possible, if that data is not necessary for audit, inspection or other control purposes.
- Independent actors may archive public websites. The EEAS is not responsible for these archives.

<u>Security of data</u>: Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. 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. Where needed, communications are encrypted. EEAS webpages can be accessed using the 'https:' protocol. Computer systems are protected by physical protection measures.

#### 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 <a href="mailto:edps@edps.europa.eu">edps@edps.europa.eu</a>.