

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

CONTACT LISTS I. – DATA PROCESSING FOR THE PURPOSE OF COLLECTING AND MAINTAINING CONTACT DETAILS OF OFFICIAL EXTERNAL PARTNERS BY EEAS AND EU DELEGATION SERVICES

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CONTACT LISTS II. – DATA PROCESSING FOR THE PURPOSE OF SENDING NEWSLETTERS, SURVEYS, INVITATIONS AND OTHER EU-RELATED INFORMATION BASED ON CONSENT

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?

I. CONTACT LISTS OF OFFICIAL EXTERNAL PARTNERS COLLECTED AND MAINTAINED BY EEAS SERVICES AND EU DELEGATIONS FOR THE PURPOSE OF COOPERATION AND INFORMATION EXCHANGE

The purpose of processing data in the context of contact lists for official partners of the EEAS is to enable for EEAS divisions, directorates and EU Delegations to establish and maintain contacts with relevant partners and stakeholders, including Member State embassies, Member State and host country authorities, EU institutions and other organisations, as well as to provide information, documents or reports related to the activity and functioning of EEAS including Union Delegations in the public interest of cooperation and information exchange. Cooperation and contact keeping as well as information to be provided to the public on EU values and activities are necessary for performing tasks pursuant to the Treaty on the Functioning of the European Union and to the Council Decision establishing the EEAS.

II. CONTACT LISTS FOR THE PURPOSE OF SENDING NEWSLETTERS, SURVEYS, INVITATIONS AND OTHER EU-RELATED INFORMATION BASED ON CONSENT

The purpose of processing data provided on a voluntary basis by newsletter subscribers, survey respondents and event participants is to enable the EEAS and EU Delegations to send information, including newsletters and event invitations as well as to conduct surveys in order to receive and analyse views and potentially publish opinions in an aggregated format. Data are collected, among others, from participants of former events organised by EEAS or Union Delegation services or their partners and processors, having explicitly agreed to the further processing of their data, to invite potentially interested participants to future events and to send them EU-related information.

3. DATA PROCESSED: What data do we process?

The types of data, including personal data, collected and processed are as follows:

I. CONTACT LISTS OF OFFICIAL EXTERNAL PARTNERS COLLECTED AND MAINTAINED BY EEAS SERVICES AND EU DELEGATIONS

- Surname(s) and first name(s)
- Title
- Function and organisation
- Responsibility (including thematic portfolio/area)
- Professional (Office) address
- Professional e-mail address, private e-mail address used to subscribe to the newsletter
- Professional phone number including official mobile number
- Private mobile phone numbers in case provided voluntarily
- Professional telefax number
- Nationality
- ID number, if necessary for the purpose of access to premises
- CV details if necessary, only accessible on a need to know basis
- Information provided to the EEAS in the framework of the information exchange, including EU-related surveys

Data of official partners are collected in the framework of the cooperation between the EEAS and partner entities. Professional details may be collected from publicly available or inter-institutional sources.

II. CONTACT LISTS FOR THE PURPOSE OF SENDING NEWSLETTERS, SURVEYS, INVITATIONS AND OTHER EU-RELATED INFORMATION BASED ON CONSENT

- Surname(s) and first name(s)
- Contact data, including:
 - Professional e-mail address, private e-mail address used to subscribe to the newsletter
 - Professional phone number including official mobile number
 - Private mobile phone numbers in case provided voluntarily
 - Professional telefax number
- Areas of interest and other data facilitating provision of information, provided on a voluntary basis
- Contribution to surveys: responses to questions, enquiries, including demographic data. We conduct anonymous surveys except where collecting contact details are necessary, among others, for giving feedback or requesting additional information or providing a prize.

These data are communicated on a voluntary basis.

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

The data controller determining the purpose and means of the processing is the European External Action Service (EEAS). The EEAS Division entrusted with managing the EEAS standard newsletters and alerts under the supervision of the Head of Division is the following organisational entity:

EEAS.SG.STRAT.1 - Strategic Communications 1 - Communications Policy & Public Diplomacy Division

In the context of management and maintenance of contact lists or specific newsletters, the EEAS Directorate, Division or EU Delegation that contacted you or you have been in contact with and maintains the contact list or manages a specific newsletter you receive, is the organisational entity responsible for the personal data processing under the supervision of the relevant Director, Head of Division or Head of Delegation. In case of contact lists, you can send an e-mail to the address that you receive e-mails from or use for keeping contact. In case of newsletters, you can contact the Strategic Communication Division at STRATEGIC-COMMUNICATIONS@eeas.europa.eu or WEBSITE@eeas.europa.eu.

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

The recipients of your data may be

- Assigned staff of the EEAS/EU DEL service maintaining contact lists of official external partners for the purpose of cooperation and information exchange
- Assigned staff of the EEAS/EU DEL service maintaining contact lists for the purpose of sending newsletters, conducting surveys, and inviting potential event participants
- Service providers

Service providers are to 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 can be found on the website of the contracted organisation, you can contact the data controller for information on the service provider(s).

In the framework of the external relations cooperation and tasks, provision of contacts to third parties, including third countries or international organisations, could be foreseen. Transfers of data to a third country provider including a newsletter service or platform may take place only in case appropriate safeguards are ensured.

Information will not be communicated to third parties, except where necessary for the purposes outlined above.

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 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 its use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. You can always unsubscribe from the newsletter or contact list either automatically on the newsletter or by sending an e-mail as described below. Special attention is drawn to the consequences of a request for deletion, in which case any means to be able to contact you may be lost.

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. 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, please see, as follows:

In case of contact lists, you can send an e-mail to the address that you receive e-mails from or use for keeping contact. In case of newsletters, you can contact the Strategic Communication Division at STRATEGIC-COMMUNICATIONS@eeas.europa.eu or WEBSITE@eeas.europa.eu.

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

I. The processing of personal data related to contact lists maintained by the EEAS and EU Delegations 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), namely **to enable cooperation and exchange of information.** Please see related legal references* below.

II. The processing of personal data with regard to contact lists serving to distribute newsletters and other EU related information as well as to invite participants to events and take part in surveys managed by the EEAS or EU Delegations is based on your consent [Article 5(1)(d) of Regulation (EU) 2018/1725]. You can agree to the data processing by filling in a consent form or by subscribing to a newsletter. You can withdraw consent any time by unsubscribing from the newsletter or by contacting the data controller at the functional mailboxes under Point 6.

* Public mandate related legal references: The Union's objectives in its external relations are defined in Article 3(5) of 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.

- 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 http://eeas.europa.eu/eucom/news/index_eu.htm
- Council Conclusions, October 2016 - *"the need of joining up efforts in the field of public diplomacy including strategic communication, inside and outside the EU, to speak with one voice and ultimately promote its core values"*
- COMMUNICATION AND VISIBILITY MANUAL for European Union External Actions 2010
- European Commission, DG Communication, Action Plan to Improve Communicating Europe, July 2005, p.2. at http://ec.europa.eu/dgs/communication/pdf/communication_com_en.pdf (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"
- 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)
- Draft Communication from Mrs Ferrero-Waldner to the Commission, *The EU in the World: Towards a Communication Strategy for the European Union's External Policy 2006-9*, C(2006) 329/1, p.1

Further legal references: The Treaty on European Union (Lisbon Treaty), Article 2, Official Journal of the European Union C 83/17, 30 March 2010 Article 1 (Nature and Scope), 2 (Tasks) and 3 (Cooperation) of the Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) available on http://www.eeas.europa.eu/background/docs/eeas_decision_en.pdf

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

I. In the framework of official cooperation with external partners, data will only be retained for the period corresponding to the partners' cooperation relationship with the EEAS Directorate/Division/Delegation.

II. In the context of contact lists maintained for the purpose of sending newsletters or of further data storage for future events data are kept until the subscription to the newsletter is upheld or until you withdraw consent.

Data collected via surveys are kept as long as the survey is processed. The results are kept in a summarised way. Individual contact data and the link between responses and the contact data are kept as long as necessary for the purpose (see point 2 above) but no longer than one year. Data will be deleted or modified as relevant after the retention period has elapsed.

Security of data: 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. For certain online surveys, questionnaires and quiz, an EU Login password shall be applied to access the application. This EU Login identification is necessary to guarantee for participants to fill in the form only once and thus to avoid distorted results. It is ensured by the Controller and instructed to the IT Division of the EEAS that the access through the EU Login password will not be used to link the person giving his/her answers for the survey / questionnaire / quiz with the given replies. The replies, together with the chosen language used for drafting the reply, are recorded in a secured and protected database hosted by the EEAS/Commission, the operations of which abide by the EEAS/Commission's security decisions and provisions established by the Directorate of Security for this kind of servers and services. Inside the EEAS, the database can be accessed using an EU Login account or UserID/Password. Access to the application is via an encrypted connection using the normal https protocol. In case the surveys / questionnaires / quizzes / public consultations is launched by an external company the collected personal data and all information related to the above mentioned consultation is stored on a computer of the external contractor, acting as processor, who has to guarantee the protection of data and confidentiality required by the data protection regulation applicable for EU institutions, bodies, office and agencies.

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

In case you have queries, you can also contact the EEAS Data Protection Officer at data-protection@eeas.europa.eu.

10. RECOURSE

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