

# EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

## FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO CORPORATE SPONSORSHIP IN EU DELEGATIONS BASED ON EEAS GUIDELINES FOR CORPORATE SPONSORING AND CO-HOSTED EVENTS

### 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 purpose of the data processing activity is to administer corporate sponsoring. As of 1<sup>st</sup> January 2019, the new Financial Regulation allows in Article 26 the acceptance of corporate sponsorship of events organised by the EEAS. In this context, the EEAS has adopted Internal Rules specifying the use of corporate sponsorship. Corporate sponsoring occurs where partners (sponsors) support an event organised by an EU Delegation by providing goods or services for free (in kind) and therefore corporate sponsoring is to be distinguished from donations and co-hosting. Corporate Sponsoring foreseen in Art. 26 of the FR only refers to EU Institutions accepting in-kind sponsoring from external entities under the form of in-kind revenues.

As Union Delegations may accept in kind sponsorship, information given by the sponsor will be registered by the Delegation and eventually published on the website of the EEAS (for sponsorships above 5000 EUR) or on the Reporting Portal (for values between 1000 and 5000 EUR).

#### Description:

The sponsors may provide to the Delegation contact information for the person in charge with the event/sponsoring or other details concerning the organisation (names of staff, professional addresses, contacts etc). The data will be kept at Delegation level (except for the sponsoring that is to be published as explained above).

The contact information/other data, except the value and the description of the sponsoring, which may be given to the Heads of Administration, are not to be made public.

In case the information is published on the Reporting Portal (based on the value of the sponsoring), each Delegation will introduce the data that will be stored by the EEAS (on a protected server).

#### Definition of corporate sponsorship

1. 'Corporate sponsorship' means an agreement by which a legal person supports in-kind an event or an activity for promotional or corporate social responsibility purposes.
2. On the basis of specific internal rules, which shall be published on their respective websites, Union institutions and bodies may exceptionally accept corporate sponsorship provided that:
  - a) there is due regard to the principles of non-discrimination, proportionality, equal treatment and transparency at all stages of the procedure for accepting corporate sponsorship;
  - b) it contributes to the positive image of the Union and is directly linked to the core objective of an event or of an activity;
  - c) it does neither generate conflict of interests nor concern exclusively social events;
  - d) the event or activity is not exclusively financed through corporate sponsorship;
  - e) the service in return for the corporate sponsorship is limited to the public visibility of the trademark or name of the sponsor;
  - f) the sponsor is not, at the time of the sponsorship procedure, in one of the situations referred to in Articles 136(1) and 141(1) and is not registered as excluded in the database referred to in Article 142(1).
3. Where the value of the corporate sponsorship exceeds EUR 5 000, the sponsor shall be listed in a public register that includes information on the type of event or activity being sponsored.

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

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

- Names
- Official contact details
- Position within the organigrams
- Function

### 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 responsible for managing the personal data processing under the supervision of Head of Division is:

**RM.BS Directorate, BUDGET Division (RM.BS.1)**

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

The recipients of your data may be

- EU Delegations: assigned staff of the administration section (Heads of Administration) and Heads of Delegation
  - Headquarters: assigned staff from Directorate General Resource Management (DG.RM) on a need to know basis
- For transparency reasons the official name of the sponsor, the contribution and the event sponsored is published on the EEAS/EU Delegation website.

Personal data is not intended to be transferred to a third country or an international organisation and the given information will not be communicated to third parties, except where necessary as 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. 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. Data processed due to the job function of the data subject can be erased only with the agreement of the employer. We will consider your request, take a decision and communicate it to you. For more information, please see 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 have questions concerning the processing of your personal data, you may address them to the Data Controller via FMB:

**EEAS RM BS <RM-BS@eeas.europa.eu>**

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

Lawfulness: The processing of your personal data is necessary for the performance of a task carried out by the EEAS 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.

- Article 26 of the Financial Regulation: 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 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018R1046>)
- EEAS Guidelines of 01/02/2019 for Corporate Sponsoring and co-hosted events (ARES(2019)599673)
- 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.

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

Retention: Personal data is kept for a maximum period of 5 years.

Security of data: Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data.

Data is processed by assigned staff members. General access to personal data is only possible by EU Login account authentication through unique password, associated with only one email address with double authentication. The level of access to data within the system is controlled via assigned user roles. Physical files are stored in secured cupboards in a locked place. Files containing personal data can be accessed only by authorised users, who manage the data according to appropriate security measures. Data in the system is stored by the EEAS on servers located in the Data Centres of the Directorate General of Informatics (DG DIGIT) of the European Commission in Luxembourg, which abide physical and cyber security rules. Data on the Reporting Portal is accessible only from the internal network of the EEAS. The data traffic between the servers and the client browsers is encrypted. The contact information/other data, except the value and the description of the sponsoring are not to be made public.

### 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).