

EEAS Personal Data Processing Record

Ref. Article 31 of Regulation (EU) 2018/1725 - Legal obligation for maintaining records

1	Title of the processing activity	Surveys, Quizzes and Consultations of the European External Action Service, including Staff Surveys and the Europe Day Quiz
2	Update of the record (last modification date)	15/12/2020
3	Register reference number	961
4	Identity and contact details of the Data Controller Joint Controller (if applicable) Data Processor (if applicable)	<p>Data Controller: European External Action Service Rond Point Schuman 9A, 1046 Brussels, Belgium For internal surveys : EEAS BA.HR Directorate - Human Resources For external surveys including surveys related to promotion of European Values and public diplomacy: Directorate for Interinstitutional Relations, Policy Coordination and Public Diplomacy (SG.AFFGEN) Processor:</p> <p>For the specific processing 'Europe Day: IBF International Consulting, Avenue Louise 209A, 1050 Bruxelles, Belgium Veedoo is a sub-processor for the specific event Europe Day for the management and technical functionality of the quiz and to prepare anonymous statistics. (United Kingdom 2A Stanley Road , Oxford, OX4 1QZ ; Ukraine , 40v, Verhniy Val , Podil, Kyiv) Data Protection Officer:</p> <p>Emese Savoia-Keleti, SG.AFFGEN.DPO</p> <p>DATA-PROTECTION@EEAS.EUROPA.EU</p> <p>Remarks This Record is made under the responsibility of the Controller and covers a wide range of surveys / questionnaires / quizzes / public consultations organised by the EEAS, provided they are in line with the present notification. The Director, the Head of Division, the Head of Delegation in the EEAS launching the surveys / questionnaires / quizzes / public consultations will be considered as the sub-controller and will receive a note informing him/her on his/her rights and obligations in this context. DG DIGIT of the European Commission is mentioned as processor given that personal data processed in the context of the surveys / questionnaires / quizzes / public consultations could be collected through the means of IT Tool IPM EU Surveys which is part of the DIGIT record, If personal data in the context of the surveys / questionnaires / quizzes / public consultations are processed by an external company, this company is considered as processor acting under the responsibility of the EEAS. The external processor will have to sign a contract including the clause on data protection. . Surveys / questionnaires / quizzes / public consultations will be covered only within the limits of this record</p>
5	Identity and contact details of the Data Protection Officer	<p>EEAS Data Protection Officer (DPO): Emese Savoia-Keleti. SG.AFFGEN.DPO Functional Mailbox of the DPO: DATA-PROTECTION@eeas.europa.eu</p>

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Purpose of the processing activity

The purpose of the processing activity is to receive and analyse the views of those concerned by the topics of the survey (including staff opinion survey), questionnaire, quiz, public consultation and to potentially publish the views and/or the analysis, anonymously in case of surveys, questionnaires and quizzes, on the relevant website.

Description

EEAS carries out internal and external (with interested parties and in cases with the general public) surveys / questionnaires / quizzes / public consultations of stakeholders and/or the public on any initiative that would benefit from external input at various stages including development, implementation and evaluation. Consultations give the possibility to interested parties to be heard. Stakeholders may be invited to present their views in writing, in the context of public consultations. The public and interested parties at large may be invited via e-mail, the Internet (e.g. IPM EU surveys IT Tool on via EEAS website) or traditional alternatives (press releases, mailings), to fill in an on-line questionnaire or to provide feedback by e-mail or any other means.

Data shall be provided by the interested parties on a voluntary basis. The stakeholders and the public at large, as well, send their contributions to public consultations on a voluntary basis.

The following types of surveys / questionnaires / quizzes / public consultations may be launched:

- Surveys / questionnaires / quizzes / public consultations launched through the IT Tool IPM EU survey or equivalent, or through EEAS website

- Surveys / questionnaires / quizzes / public consultations launched by e-mail

- Surveys / questionnaires / quizzes / public consultations launched by conferences

- Surveys / questionnaires / quizzes / public consultations launched by an external company, acting as processor *

* Certain online surveys, questionnaires and quizzes are provided / maintained by specific IT platforms, recommended by the service provider under the Framework Contract. One of the providers for Europe Day 2021 is taken over from an EEA-based company by United Kingdom / Ukraine based company.

For illustration purposes – Description of the Europe Day 2020, which will include the objectives of the upcoming Europe Day quizzes.

The purpose of the data processing is to manage the online Quiz developed specifically for the EUROPE DAY 2020. 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 SEEUX , an Italian-based service provider and managed by the Strategic Communications team of the European External Action Service with the technical assistance of IBF International , a Belgian enterprise. 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. You 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.

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7	Legal basis and lawfulness	<p>The processing of personal data related to communication with the wider public, including the launching of surveys, quizzes and consultations is necessary for the performance of a task carried out in the public interest as mandated by the Treaties, in particular by articles 5, 11, 20, 21-40, 42, 43 of the of the Treaty on European Union (TEU) and Article 27 of TEU as well as 2 (4) and (5), 205, 220-221, 326 – 334 of the Treaty on the Functioning of the European Union (TFEU).</p> <p>The personal data processing operations linked to surveys, questionnaires, quizzes and consultations are indispensable for having the views, as widely as possible, of stakeholders or the public at large in developing new or existing policies and for the implementation of the related-programmes managed by the EEAS. Additionally, public consultation contributes to regulatory quality and transparency and increases the involvement of stakeholders and the public at large in the frame of better regulation.</p> <p>Relevant legal references:</p> <ul style="list-style-type: none"> - Articles 1 and 2 of the Council Decision 2010/427/EU of 26 July 2010 establishing the organisation and functioning of the European External Action Service (OJ L 201, 3.8.2010, p. 30-40) - Paragraph 6 of Article 9 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 - on communication and public diplomacy - Paragraph (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 - on information and public diplomacy - 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 - Council Conclusions, October 2016: On that occasion the Council of the European Union stressed 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 "Service OJ L 201, 3.8.2010, p. 30–40 <p>Concrete quiz data processing – Europe Day</p> <p>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 "Personal data types")</p> <p>For the management and technical functionality of the quiz and to prepare 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) 2018/1725).</p> <p>If individuals consent to provide their e-mail and name for processing by the EEAS/EU Delegations for the purpose of sending participants further information about the EU, the processing is lawful under Article 5.1 (d) of Regulation (EU) 2018/1725. It is communicated to individuals that they can withdraw their consent at any time by notifying the Data Controller, however it is underlined that the withdrawal will not affect the lawfulness of the processing carried out before they withdrew their consent. (To be noted that this consent is not under Chapter V, as data is communicated to the EEAS for dissemination of further information).</p>
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8	<p>Categories of individuals whose data is processed</p> <ul style="list-style-type: none"> - Data subjects 	<p>All individuals and group of persons (internal and external) participating to the surveys/questionnaires/quizzes/public consultations</p> <p>External participants may include:</p> <ul style="list-style-type: none"> - Interested third parties - General public <p>Internal participants refer to statutory staff that include:</p> <ul style="list-style-type: none"> - Officials - Temporary Agents - Contract Agents - Seconded National Experts - Junior Professionals in Delegations - Trainees - Local Agents
9	<p>Categories of data - Data processed</p>	<p>For the purpose of surveys, questionnaires, quizzes - data may include the following:</p> <ul style="list-style-type: none"> - Statutory status, - Gender, age group, number of years of professional experience, place of assignment <p>For the purpose of surveys - data as part of the results will be used in an aggregated form that will not allow the identification of individuals within a response category of the survey.*</p> <p>For the purpose of public consultations - data including personal data may include the following:</p> <ul style="list-style-type: none"> - Title - First Name - Family Name - Organisation - Department/Service - Organisation's geographic area of activity - Street and number, Country, Postal Code, City, Phone, Fax - E-Mail Address - Data subject's categories they represent - Language - Age Group - Contribution <p>The data are provided on a voluntary basis. No data field falls under special categories of data defined by the data protection regulation applicable for EU institutions, bodies, offices and agencies [Regulation (EU) 2018/1725].**</p> <p>* For certain online surveys, questionnaires and quizzes, an EU Login password shall be applied to access the application.</p> <p>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,</p>

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	<p>who has to guarantee the protection of data and confidentiality required by the data protection regulation applicable for EU institutions, bodies, office and agencies..</p> <p>** The processing of special categories of data, - data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and of data concerning health or sex life -, are prohibited.</p> <p>Data Processed for the Europe Day quiz:</p> <ul style="list-style-type: none"> - Name (not required for the filling in the quiz) - E-mail address (not required for the filling in the quiz) - Age-range (optional data for statistical purposes) - Occupation (optional data for statistical purposes) - User Name (avatar names and/or real names) - Nationality, e.g. for individuals portrayed in a video, influencers - Age e.g. for individuals portrayed in a video, influencers - Contact data (Influencers 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. <p>Material shared in social media if the influencers or users give their consent to use it in the communication activities of the EEAS or EU Delegations on social media.</p>
10	<p>Recipients of data – Access to data</p> <ul style="list-style-type: none"> - Assigned staff member(s) of the relevant department / division / directorate responsible for launching the survey / questionnaire / quiz / public consultation. The access to all personal data as well as all information collected in the context of this survey / questionnaire / quiz / public consultation is only granted through ECAS or UserId/Password to a defined population of users, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection task in accordance with Union legislation. These users typically are members of the EEAS department, directorate, division or EU delegation organising the survey / questionnaire / quiz / public consultation. - Contractor assigned staff, if the survey, quiz or consultation is launched by an external company, acting as a data processor. The contracted service provider with its subcontractor(s) will process data on behalf of the EEAS in accordance with Article 29 of Regulation (EU) 2018/1725, only on documented instructions, ensuring appropriate safeguards and security measures. Further information on how providers process personal data, including their privacy policy can be found on their websites. <p>Data will not be used for profiling . The EEAS will not share personal data with third parties for direct marketing purposes.</p> <p>For certain processing activities opinions and results of survey / questionnaire / quiz / public consultation may be published in anonymous form on the web and made publicly available. In case some personal data is intended to be published on the web, you will be informed by the instruction notice of the survey / questionnaire / quiz / public consultation. If you do not agree with the publication of your personal data, please opt-out by informing the data sub-controller, i.e. the department organising the survey / questionnaire / quiz / public consultation by using the contact information available on the survey / questionnaire / quiz / public consultation application or the Controller. In case of public consultations, received contributions, i.e. answers to the given questions, together with the identity of the contributor, could be published on the Internet, unless you, as contributor object to publication of the personal data. In this case the contribution may be published in anonymous form. Any objections concerning publication of personal data should be sent by informing the controller contact team – the EEAS entity – organising the survey / questionnaire / quiz / public consultation by using the contact information available on the survey / questionnaire / quiz / public consultation application.</p> <p>Personal data is not intended to be transferred to a Third Country, not to an international organisation. The given information will not be communicated to third parties, except where necessary for the purposes outlined above.</p>

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11	Transfer to Third Countries or International Organizations (IOs) and suitable safeguards (if applicable)	<p>As part of the survey, quiz, questionnaire and consultation, some data - primarily aggregated results - may be transferred to the web. If personal data are published on a publicly available website, these data are accessible worldwide. Following the opinion of the EDPS of 13/02/2007, this does not constitute a transfer of personal data under Art. 9 of Regulation 45/2001 (replaced by Chapter V of Regulation (EU) 2018/1725). The participants are to be aware of such a publication and the possibility of opting out is to be provided.</p> <p>Concrete processing activity and potential transfer: 'TogetherWeAreEurope' quiz - Europe Day (2021) Veedoo (to be taking over to manage platform and translations) United Kingdom, 2A Stanley Road, Oxford, OX4 1QZ Ukraine, 40v, Verhniy Val, Podil, Kyiv</p> <p>Concrete processing activity and potential transfer: 'TogetherWeAreEurope' quiz - Europe Day (2021) Veedoo (to be taking over to manage platform and translations) United Kingdom, 2A Stanley Road, Oxford, OX4 1QZ Ukraine, 40v, Verhniy Val, Podil, Kyiv</p>
12	Time limit for keeping the data - Retention period	<p>Personal data is kept as long as follow-up actions to the surveys / questionnaires / quizzes / public consultations are necessary with regard to the purpose(s) of the processing of personal data as well as for the surveys / questionnaires / quizzes / public consultations and its related management.</p> <p>All personal data will be deleted from databases 1 year after the last action in relation to the surveys / questionnaires / quizzes / public consultations. Nevertheless, especially with regard to public consultations personal data - a list of contact details - could be kept longer for contacting participants in the context of future EEAS activities. You can request the abandon of such an extension, i.e. if you do not agree with this, please contact the sub-controller, the department organising the survey / questionnaire / quizzes / public consultation by using the contact information available on the survey / questionnaire / quizzes / public consultation application or the Controller by explicitly specifying your request. Reports containing personal data will be archived according to appropriate provisions. Personal data stored by the external company in charge of the surveys / questionnaires / quizzes / public consultations should be deleted as mentioned above.</p>
13	Data Storage	<p>The personal data are stored on servers that abide by pertinent security rules. Physical copies of personal data, if prepared, are stored in a properly secured manner.</p>
14	General description of security measures	<p>Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The personal data collected by the EEAS/EU Delegation 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.</p>

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15	Rights of individuals	<p>Individuals have the right of access to their 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, individuals have the right to ask the deletion of their personal data or restrict their use as well as to object at any time to the processing of their personal data on grounds relating to their particular situation. The EEAS will consider the request, take a decision and communicate it to the individuals 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, information can be found 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.</p> <p>If individuals have questions concerning the processing of their personal data, they may address them to the Data Controller via the following functional mailboxes:</p> <p>For internal consultations: HUMAN-RESOURCES@eeas.europa.eu</p> <p>For external surveys including surveys related to promotion of European Values and public diplomacy: sg-affgen-6@eeas.europa.eu</p>
16	Information to data subjects	<p>Information is provided to the Data Subjects related to this Record in the Privacy Statement. The Privacy Statement or Data Protection Notice is accessible on the intranet / internet of the EEAS.</p>