



PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF
PROCESSING PERSONAL DATA IN THE RAPID ALERT SYSTEM (RAS), THE COMMUNICATORS PORTAL (CP) AND THE NETWORK AGAINST DISINFORMATION (NAD) RELATED TO INFORMATION EXCHANGE ON DISINFORMATION, INFORMATION MANIPULATION AND PROACTIVE COMMUNICATION OF EU TOPICS VIA THE SPACES OF THE JOINT COOPERATION PLATFORM PROVIDED BY THE EEAS

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to EU institutions, in particular to the European External Action Service (EEAS), to the General Secretariat of the Council (GSC) and to the European Commission (EC). You have the right under EU law to be informed when your personal data is processed [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 as well as the GSC and the EC process your personal data and what rights you have as a data subject related to the information exchange via the spaces of the Rapid Alert System (RAS), the Communicators Portal (CP) and the Network against Disinformation (NaD).

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

The overall platform comprising the Rapid Alert System (RAS), the Communicators Portal (CP) and the Network against Disinformation (NaD) aims to increase cooperation between the EU Institutions and Agencies and EU Member States as well as international partners on the topic of strategic communication and tackling disinformation as well as information manipulation. Having a single platform to share proactive communications material, best-practises in engaging with citizens on specific topics and tackling disinformation / information manipulation facilitates the joint approach to these aims between EU Institutions and EU Member States and avoids a proliferation of different platforms that would put additional burden on their users, in particular taking into consideration that there are overlaps in the membership of the RAS, the CP and the NaD.

To ensure proper working of the **Rapid Alert System**, the **Communicators Portal** as well as the **Network against Disinformation** and to create a safe space for exchange of information on the handling of disinformation and information manipulation, to share communications material to provide factual information about EU policies and to build a community based on mutual trust are common objectives of the European Commission, of the Council of the European Union and of the EEAS. All three spaces have a distinct focus, and at the same time, they all are part of the platform, as they are concerned to the EU's aim and mandate to tackling disinformation / information manipulation and strategic communication along with building closer cooperation between EU entities and with EU Member States, being a joint purpose of all three participating institutions.

The purpose of the present processing activity in the context of the **Rapid Alert System (RAS)** is to enable the exchange of information as well as alerts on foreign disinformation, information manipulation and interference through a dedicated technological infrastructure, which facilitates sharing of assessments and enables common situational awareness between EU Member States and EU Institutions, coordinated activity as well as attribution and common responses. The Rapid Alert System is an important component of the European Union's overall approach to tackling disinformation and information manipulation, as set out in the Action Plan against Disinformation, which was endorsed by the European Council in December 2018. Its work, focussing exclusively on foreign disinformation and information manipulation, can be considered complementary to the work of the NaD.

The **Communicators Portal (CP)** allows uploading and exchanging communication products (such as videos, texts, images, infographics, animations, etc.) among EU Institutions and EU Member States. This aims at intensifying the cooperation between the EU Institutions and the EU Member States when it comes to proactive communication about topics related to the European Union and make EU communication more effective. This work increases the overall better coordination of communication among EU Institutions and EU Member States and facilitates the spread of factual information. While not directly related to tackling disinformation / information manipulation, factual and effective proactive communication about EU issues is a core pillar also in the EU's work to tackle mis- and disinformation as well as information manipulation. The work of the CP can therefore be seen as complimentary to the work undertaken in the RAS and the NaD.

The **Network against Disinformation (NaD)** plays a central role in the European Union's approach to tackling disinformation, allowing for the exchange of information, public data and good practices among the members. These Members are EU Institutions (both EC and EEAS), the EC Representations as well as EU Agencies and EU Member States. The NaD focusses on misinformation and disinformation targeting the European Union or issues important to the EU, increasing joint situational awareness amongst its members. Therefore, its work can be seen as complementary to the work of the Rapid Alert System, which looks at foreign disinformation and information manipulation, as well as the Communicators Portal with its aim to share proactive communications material.

The RAS, the CP and the NaD increase cooperation between different stakeholders in the European Union, ensuring a joint-up approach and concentrating all of this work on one single platform, while at the same time allowing for the different networks to set their priorities and focus according to their specific needs.

3. DATA PROCESSED: What data do we process?

Personal data of:

- 1) national and EU institution points of contact for the Communicators Portal, as well as of EU Executive Agencies;
- 2) national and EU institution points of contact for the Rapid Alert System, as well as from EU Agencies and EU Representations as well as representatives of the G7 member states (for the G7 Rapid Response Mechanism) and assigned NATO staff;
- 3) EU Institution and EU Executive Agencies points of contact as well as representatives of EC Representations for the Network against Disinformation;

include:

- name
- mobile telephone number (optional, are used to send sms alerts, in its absence only e-mail alerts are sent) – only relevant for the RAS
- e-mail addresses,
- Member State relevant for the RAS and CP
- Directorate-General or Executive Agency of affiliation relevant for the NaD
- information on the professional occupation and work place,
- photo (optional)
- additional information voluntarily provided by the individual member, such as a short CV (optional)

Content-type data linked to the open source materials that will be uploaded to or exchanged in the systems/portals by their participants, including names, e-mail addresses, public social media account details and behaviour. Only personal data which appear in open sources are processed, they are not intended to be specifically collected, neither to be further processed in any way.

Any content uploaded in the CP, NaD and RAS by the parties must be compliant with the respective Data Protection legislation.

Users access the Rapid Alert System, the Communicators Portal and the Network against Disinformation through EULogin, a secured application of the European Commission. Data Controllers only receive information from EULogin about your identity that is necessary to confirm user access to the platform as well as to solve technical problems. More information on: <https://webgate.ec.europa.eu/cas/privacyStatement.html>.

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

Concerning the personal data appearing in the content of the Rapid Alert System as well as data of users of the Rapid Alert System, 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 the Head of Division is the following organisational entity:

EEAS.SG.Strat.2 - Strategic Communications: Task Forces and Information Analysis Division

Concerning the personal data processed in the framework of the Communicators Portal, the data controller determining the purpose and the means of the processing activity under the supervision of the Director General is the following entity:

Communications Directorate General of the General Secretariat of the Council (GSC) of the European Union

Concerning the personal data appearing in the content of the Network against Disinformation, the data controller determining the purpose and the means of the processing activity under the supervision of the European Commission's Directorate-General for Communications is the following entity:

European Commission DG COMM - Unit "Strategy & Corporate Campaigns"

While for the personal data in the content of the three spaces of the platform, the controllers are the relevant EU institutions individually as detailed above, the personal data of users are processed by the above controllers as follows:

- User data in the Communicators' Portal are processed together by the GSC and the EEAS.
- User data in the NaD are processed together by the DG COMM and the EEAS
- User data in the RAS are processed solely by the EEAS.

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

The recipients of your data may be:

- EEAS Strategic Communications Division staff members assigned to manage and moderate the work of the Rapid Alert System and assist COMM directorate-general of the Council of the European Union in managing the work of the Communicators Portal and the European Commission DG COMM - Unit "Strategy & Corporate Campaigns" in managing the work of the Network against Disinformation.
- Staff of the COMM directorate-general of the Council of the European Union assigned to manage and moderate the work of the Communicators Portal
- European Commission's Strategy & Campaign unit staff assigned to manage and moderate the work of the Network against Disinformation.
- Staff of the EEAS IT department responsible for development and technical supervision of the IT systems (see note below)*.
- Staff of the GSC IT department responsible for development and technical support with regard to the CP
- Staff of the European Commission's IT department responsible for ensuring the functioning of 2-factor-authentication through the EU Login application, through which users access the Rapid Alert System, the Communicators Portal and the Network against Disinformation.
- National contact points as well as additional members from EU Member States and EU institutions, EU Executive Agencies and EC Representations, who have been registered to the system (RAS, CP and NaD) as its users with viewer or contributor rights.
- Representatives of the G7 Rapid Response Mechanism and NATO Headquarters assigned staff, in the framework of the International Cooperation Space on the Rapid Alert System. These representatives of the G7 RRM and NATO may have access to information on user profile with the safeguard of signing a confidentiality declaration.

Deviating from the above, personal data appearing in the content of the portals is visible only to the users of the respective spaces (RAS, CP or NaD). Personal data is not intended to be transferred to a Third Country, nor to an International Organisation (except for the above, in particular with the exception of the members of the G7 Rapid Response Mechanism and of NATO Headquarters assigned staff). The given information will not be communicated to third parties, except where necessary for the purposes outlined above.

*Note: Staff of the service provider for the platform supporting the RAS, NaD and CP assist EEAS IT experts in resolving technical issues and have access to the platform and the data of users contained therein only when finding solution to technical problems and questions. The service provider is a U.S.-based enterprise (<https://www.aurea.com>) that will process data merely occasionally, as far as necessary for technical assistance, and on documented instructions provided by EEAS IT experts, solely on behalf of the EEAS pursuant to Article 29 of Regulation (EU) 2018/1725. In cases where the Aurea Messaging Solutions (AMS) "AlertFind" is used, staff of the service provider may have access to personal data. These personal data are processed in full compliance with Regulation (EU) 2018/1725.

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. You, as a user, are able to access and edit your profile directly on the platform. The right of rectification can only apply to factual data processed. Under certain conditions described among others in Articles 14 (4), 18, 19(1) (a-f), 20 (1) (a-d) and 22 (1) (a-b) of Regulation (EU) 2018/1725, 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. 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 respective Data Controllers via the functional mailbox below.

Concerning the Rapid Alert System, please contact:

Rapid-Alert-System@eeas.europa.eu

Concerning the Communicators Portal, please contact:

information.wp@consilium.europa.eu

Concerning the Network against Disinformation, please contact:

COMM-DISINFORMATION-TEAM@ec.europa.eu

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

Processing of your personal data is necessary in the public interest (Paragraph 1.a of Art. 5 of Regulation (EU) 2018/1725.

Legal reference:

Action Plan against Disinformation JOIN(2018) 36 final Brussels, adopted on December 5, 2018; concerning the third parties involved, i.e. G7 and NATO: "The Rapid Alert System should be closely linked to existing 24/7 capabilities such as the Emergency Response Coordination Centre and the Situation Room of the European External Action Service. The EU Hybrid Fusion Cell of the Intelligence and Situation Centre as well as the relevant Council Working Parties could also be used as channels for sharing information. The Commission and the High Representative will ensure regular exchange of information and best practices with key partners, including within the G7 and the North Atlantic Treaty Organisation.

The **Joint Communication on Tackling COVID-19 Disinformation** (JOIN(2020) 8 final), calling i.a. for "Combatting the flow of disinformation, misinformation and foreign influence operations, including through proactive and positive communication, calls for action through the EU's existing tools, as well as with Member States' competent authorities, civil society, social media platforms and international cooperation, enhancing citizens' resilience." It also stipulates that "Aside national information channels, the EU has played a role in this through its institutions, multipliers and networks in the Member States, in its neighbourhood and beyond. The work has included effective pro-active communication efforts to promote verifiably reliable health information, inform citizens and third-country partners about the EU's activities to tackle the crisis, as well as to raise awareness of the risks of disinformation."

The **European Democracy Action Plan** (COM/2020/790 final), that calls for "The Commission and the High Representative will strengthen cooperation structures in this area within the EU, but also with international partners. The Rapid Alert System will continue to cooperate with international partners such as NATO, the G7, but possibilities to engage with other relevant organisation such as the EU Agency for Cybersecurity (ENISA), the European Digital Media Observatory (EDMO) 86 and Europol will also be explored, as appropriate." And "The EU institutions will ensure that their internal coordination on disinformation is strengthened, with a clear protocol for action to pull together knowledge and resources quickly in response to specific situations."

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.

Access given to non-EEA (G7 and NATO) members is based on the public interest enshrined in the Action plan and the Charleroi commitments: the need for G7 members to tackle disinformation.

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

Data retention

Personal data is kept for a maximum period of one year after the termination of the operations of the Rapid Alert System, the Communicators Portal and the Network against Disinformation. Regular update of the data is guaranteed by provision of information from the national contact points and by the users themselves. Upon 3 months of inactivity, the profile will be disabled and not visible to other users, which can be reactivated upon the request of the user. Rectification or deletion of data can be requested as indicated under point 6; however, deletion of the account may result in losing contact with the EU Member State national authorities, organisations and EU institutions designating the platform user. Deletion of the account may also result in losing any content that the member of the RAS or of the Communicators Portal or of the Network against Disinformation has posted on the platform during their activity. The reasons for deletion are specified by the controller entities.

Security of data

Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. Data is processed by assigned staff members. Individual files storing personal data of users are protected by a password only known to those who need it. They are kept on the secure servers of the EEAS. 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. Access to the Rapid Alert System, the Communications Portal and the Network against Disinformation is ensured by the two-factor authentication system of EULogin. Physical copies of personal data are stored in a properly secured manner.

Participants from outside the EEA Member States have to sign a confidentiality declaration.

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, the Data Protection Officer of the General Secretariat of the Council at data.protection@consilium.europa.eu and the Data Protection Officer of the European Commission at data-protection-officer@ec.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.