

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO THE EEAS SOCIAL MEDIA PRESENCE

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 EEAS and Delegations social media activities is to promote EU values and inform audiences about its role among the widest range of public, actively involving various groups of society in Europe and across the world using a number of social media platforms. This objective aims at engaging individuals and reaching users of various platforms. Each social media platform has its own policy on the way the specific platform handles the personal data of users. The processing of personal data by the EEAS of social media users actively interacting with social media accounts of the EEAS is determined by the policy of the relevant platform. The EEAS uses both the native tools of each social media platform as well as a third party social media monitoring tools (e.g. Talkwalker and Emplifi) to retrieve information on how its content is performing, how users are responding and interacting with it and to further reach specific audiences. The main activities for which the EEAS and Delegations collect and process personal data, including user data from the social media platforms are:

- Monitoring and reporting: analysing and extracting the results and overall performance of the content shared by the EEAS for reporting and strategic improvement. This encompasses a series of Key Performance Indicators, such as the number of interactions, total reach, impressions, video views of posts
- Advertisement: tailoring posts to a pre-defined target audience
- Engagement: responding to users' comments, answer questions and maintain an active 2-way channel communication on social media
- Listening: analysing the social media environment to assess existing narratives around key matters related to EU Foreign Affairs
- Influencer activation: mapping and interacting with key users who can be potential multipliers of our key messages

*You can also visit the [Twitter / X](#), [Instagram](#), [Facebook](#), [LinkedIn](#), [Threads](#) pages and the [Youtube channel](#) of the EEAS. You can find information how these social media providers process your personal data on the [Twitter / X](#), [Facebook](#), [Instagram](#), [LinkedIn](#), [Threads](#) and [YouTube](#) privacy pages.

3. DATA PROCESSED: What data do we process?

- Accessible personal data from users' profiles: Name, username, age, gender, location and, when available, professional status, interests, public activities
- Accessible data from users' activity on social media: Pages they follow, their comments and interactions online, their followership, their network and connections
- Metadata: Personal data available via audiovisual content that might be published on the social media platforms: information in or about the content provided by a user such as the location of a photo or the date a file was created, video recordings, images of a data subject
- Unsolicited personal data processed via third-party platform, app or a website (connected to social media platform) that may be obtained when a user visits or uses their services

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:

EEAS Global Communications & Public Diplomacy Division
EEAS SG.STRAT.2

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

The recipients of your data may be

- EEAS assigned staff – STRAT.2 and other EU staff members dealing with relevant communication activities
- Contractors facilitating communication-related activities, including recording or distributing of the videos
- Contractors providing social media monitoring tools

Personal data is not intended to be transferred to a third country or an international organisation, except where necessary for the purposes as described above. In case of international transfers appropriate safeguards are ensured in accordance with Chapter V of Regulation (EU) 2018/1725. 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. 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:

STRATEGIC-COMMUNICATIONS@eeas.europa.eu

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

The processing of personal data related to the EEAS Social media presence organised by the EEAS is necessary for the performance of a task carried out in the public interest [Article 5(1)(a) of Regulation (EU) 2018/1725 as referred to in Recital 22 thereof], 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).

Legal references:

- EEAS vision for social media Ref. Ares(2016)6738179 - 01/12/2016
- 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.
- [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 FOR DATA STORED & SECURITY MEASURES: For what period and how we process your data?

Correspondence is kept for a maximum period of 3 years or the period mandated by the Common Retention List of the EEAS. The recordings are kept as long as their content is relevant in the context of the communication activity of the EEAS but no longer than 5 years. After that they may be kept for archiving purposes. Social media platforms apply their own retention policy (see point 3).

Personal data of EEAS staff are kept as long as they are in the service of the EU and a period thereafter according to the Common Retention List for Documents and Information to cater for eventual investigations, complaints and claims.

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. The server is fully protected with end-to-end encryption that ensures that all data in transit is protected and encrypted with HTTPS protocol, preventing access to data during transfer from one system to another. General access to personal data is only possible to recipients using an industry standard Two-Factor Authentication. Physical copies of personal data are stored in a properly secured manner.

Please also refer to the security policies of the platforms you use: [Twitter / X](#), [Flickr](#), [Facebook](#), [Instagram](#), [LinkedIn](#), [Youtube](#), [Threads](#).

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 edps@edps.europa.eu.