



Delegation of the European Union to the United States

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF
**PROCESSING PERSONAL DATA RELATED TO
THE EU-FUNDED PROJECT "EU POLICY AND OUTREACH PARTNERSHIP (EU POP) -USA "**
BY MEANS OF VIDEO AND TELECONFERENCING (VTC) TOOLS

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the External Action Service (EEAS) to the EU institutions and bodies, including the European External Action Service (EEAS) with the Union Delegations and the Service for Foreign Policy of the European Commission (FPI). 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 and the 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 is to ensure proper organisation and management of the project "**EU POLICY AND OUTREACH PARTNERSHIP - USA**" by the EU Delegation to the United States in order to disseminate information among participants and to the public, enhance cooperation, networking, facilitate exchange fora which are often web-based. It is also intended to further contact participants and to promote EU Public Diplomacy permitting to engage individuals in public diplomacy activities and other events.

The events organised by the EU in the framework of the EU Policy and Outreach Partnership - USA project targets a very broad public interested in the EU-US relations, including US policy experts as well as business leaders, media and the diplomatic community. The project itself is managed by the EU Delegation to the USA, based in Washington DC, with the assistance of Business and Strategies in Europe S.A, a Belgian enterprise. Business and Strategies in Europe S.A processes data on behalf of the EU Delegation to the USA (data processor).

The processing of personal data is based on voluntary registration for events. Data is collected in order to facilitate the management of events as well as to use your data for reporting and analytical purposes related to the project.

If you give your consent to be contacted by e-mail, the data may be processed also to send you a feedback survey for the event(s) you attended. In case you share the event(s), your 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.

You can find information on the legal basis in Point 7 of this Privacy Statement.

- The organisation of the project "**EU POLICY AND OUTREACH PARTNERSHIP – USA**" includes the management of contact and mailings lists for invitations, handling of participation requests and feedbacks, the preparation and distribution of preparatory materials, meeting reports, news items and publications to the participants.
- Publication and communication activity related to the project "**EU POLICY AND OUTREACH PARTNERSHIP - USA**" for dissemination purposes includes the publication of information about the event(s) on the EEAS Intranet and/or on the EEAS and FPI websites and the facilitation of photos and videos, web streaming, audio or video recording of the event.

Your personal data will not be used for automated decision-making, including profiling.

Video and Tele-conferencing (VTC)

Video and Tele-Conferencing will be used in order to meet the objectives outlined above in various situations when personal presence at a meeting is not feasible. A virtual platform (including but not limited to Worksup, webex, zoom) will therefore be used to host the event(s). Registration will be required through Salesforce, which is based in the US.

Participants may be requested to indicate their **first name, last name, e-mail address, job title, organisation, and country of residence**.

Speakers may be requested to indicate their **first name, last name, e-mail address, job title, organisation, telephone number, Twitter handle, Facebook page, and photo image**.

Recording of event sessions

The event(s), in particular when provided via videoconference, may be recorded for the following purposes:

- for future reference used by participants and organisers and for communications activities of the EEAS/EU Delegation;
- for interested individuals who were unable to attend.

It is intended that only speakers/presenters and moderators will be recorded.

3. DATA PROCESSED: What data do we process?

I. For the above-mentioned purposes your personal data will be collected as follows:

in case of participants

- **first name and last name**
- **e-mail address**
- **job title**
- **organisation**
- **occupational category**

in case of speakers

- **first name and last name**
- **e-mail address**
- **job title**
- **organisation**
- **telephone number**
- **photo image**
- **Twitter handle, Facebook page**

The data could only be used by the EU Delegation to the USA and Business and Strategies Europe S.A , acting as data processor, to contact you as detailed above.

You also have the option to click additional check boxes to give your consent for:

- further use of your contact information for communications related to the above-mentioned project of the European Union
- subscribing to the EU Delegation newsletter. If you opt-in to receive further information, we collect and process only the data that is necessary for further contact (primarily your e-mail address).
- transferring the necessary data to Business and Strategies in Europe S.A and its contractors.

If you do not consent to your data to be transferred outside the European Union/ European Economic Area (EU/EEA), namely to Salesforce , a US-based platform used for registration purposes, if available you might be able to view the recording of the events. We will inform you about the link in due time.

The Data Controller may share the **anonymous statistics** with other EU institutions or third parties for archiving or statistical/reporting purposes. Personal data will be collected, used and kept only to the extent necessary for the purposes above.

Please note that due to recordings of parts or all of the events, even if you do not share either your audio or your video, your screen name may appear in recordings.

II. In addition, data are also collected from the website or during the event(s) and processed for the purpose of informing the public, promoting EU public diplomacy in communications and publications:

- Photos, audio or video filming and web streaming of speakers, participants or organisers as well as feedbacks, surveys, reports and other information about the event (s).

Disclaimer: The organisers waive responsibility of videos/photos taken, shared, published by participants or other individuals, including journalists and other members of the press not contracted by the EEAS/EU Delegations.

III. Data collection by websites: when using online applications, websites may apply dynamic tools such as cookies for technical functioning, gathering statistics and providing a personalised experience for you as a user. More information about cookies can be found on the specific websites.

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

The data controller determining the purpose and means of the processing is the EU Delegation to the United States.

The EU Delegation to the United States is responsible for managing the personal data processing under the supervision of the Head of Delegation and is the controller entity engaging the service provider, Business and Strategies Europe S.A and its contractors, from whom you may have received the invitation to the event(s) organized under the project "EU Policy and Outreach Partnership – USA."

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

The recipients of your data may be:

- Designated organising staff of the EEAS/EU Delegation
- FPI assigned staff and other European Commission staff members designated for the tasks to be implemented
- Business and Strategies Europe S.A, as a service provider on behalf of the EU Delegation to the United States
- Participants, Interpreters, Technical staff, if relevant
- EEAS staff and other EEAS intranet users (if data published on the EEAS intranet)
- General public (if data made public on the internet, the EEAS website or social media platforms)

Personal data is intended to be transferred to a third country, namely the United States, as the registration takes place via Salesforce, a US-based platform.

- Concerning participants, limited transfers to the United States are lawful based on the derogation under article 50.1. (a) of Reg. (EU) 2018/1725, namely, on the data subjects' consent.
- Concerning speakers, limited transfers to the United States take place in accordance with the derogation under article 50.1.(d) of Reg. 2018/1725, namely, for important reasons of public interest.

Data will not be communicated to third parties, except where necessary for the purposes outlined above and will not be used for direct marketing. Under certain conditions outlined in law, we may disclose your information to third parties, (such as the European Anti-Fraud Office, the Court of Auditors, or law enforcement authorities) if it is necessary and proportionate for lawful, specific purposes. Service providers abide by contractual clauses for the protection of your data and will process data on documented instructions and on behalf of the EEAS/EU Delegation in accordance with Article 29 of Regulation (EU) 2018/1725.

Social Media

The EEAS and the EU Delegations, including Regional Teams of the FPI, use social media to promote and inform about events and meetings through widely used and contemporary channels. In addition to the [EEAS Webpage](#) or [FPI webpage](#), videos may be uploaded to the [EEAS YouTube](#) channel, and links from our website can appear on [Twitter](#), [Instagram](#), [Flickr](#), [Facebook](#), and [LinkedIn](#). The use of social media does not in any way imply endorsement of them or their privacy policies. We recommend that users read the [Twitter](#), [Flickr](#), [Facebook](#), [Instagram](#), [YouTube](#), and [LinkedIn](#) privacy policies, which explain their data processing policy, use of data, users' rights and how users can protect their privacy when using these services.

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 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 for 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. 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 have consented to recording a session, you have the right to withdraw your consent to its use by notifying the data controller. In this case, the EEAS will make every effort to remove your contribution from the recording. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent. 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:

[**delegation-usa-info@eeas.europa.eu**](mailto:delegation-usa-info@eeas.europa.eu)

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

Lawfulness of the data processing: The processing of personal data related to project "EU Policy and Outreach Partnership - USA" organised by the EU Delegation to the United States 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 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). Transfers to the US are based on art. 50(1)(a) concerning participants' data and on art. 50(1)(c) concerning speakers' data.

Further 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) and Shared Vision, Common Action: A Stronger Europe - A Global Strategy for the European Union's Foreign and Security Policy of June 2016 and Council Conclusions of October 2016 where the Council of the European Union emphasises *"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"*.

The processing is also necessary for archiving purposes. Archiving shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

At the same time, data processing for EU communication activities and publications is based on your consent requested separately (Article 5(1)(d) of Regulation (EU) 2018/1725). Participants' consent is required for:

- further use of your contact information for communications related to the above-mentioned project of the European Union
- subscribing to the EU Delegation newsletter. If you opt-in to receive further information, we collect and process only the data that is necessary for further contact (primarily your e-mail address)
- transferring the necessary data outside the EU/EEA, namely to the Salesforce, a US-based platform used for registration to the this event.

If you do not wish, you also have the option not to provide consent to any of the above. You can withdraw your consent at any time. As an alternative, you are also provided with the option to view the recording of the event(s), if it is publicly available.

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

Our aim is to keep your personal data not longer than necessary for the purposes we collect them. After the event(s), your data are kept as long as follow-up actions to the event(s) are required. Reports and other material containing personal data are archived according to e-Domec policy.

Personal data is kept for as long as follow-up actions are necessary with regard to the purposes of the processing of personal data. Personal data will be deleted five years after the last action in relation to the event. Personal data may, however, be part of a contact list shared internally among EEAS services for the purpose of promoting future EU activities and disseminating

information. The privacy statement on public diplomacy initiatives is also available on the EEAS website. Data will be kept no longer, than seven (7) years by the service provider from the date of submission of the data in line with the audit record keeping obligations of the contract binding the contractor.

The EU delegation to the US contractor, Business and Strategies in Europe S.A (see also Point 5) is bound by a specific contractual clause for any processing operations of personal data for the purposes of this project.

Financial data related to the event will be kept for a maximum period of 10 years after the end of the event or meeting for auditing purposes. Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time including the publication on the EU Delegation webpage and EEAS Intranet or EEAS website with appropriate safeguards in place.

Security of data

The EEAS, the EU Delegation and the FPI strive to ensure a high level of security for your personal 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 are stored in a secured manner. In case a service provider is contracted, as a processor, the collected data may be stored electronically by the external contractor, who has to guarantee data protection and confidentiality required by the Reg. (EU) 2018/1725. These measures also provide a high level of assurance for the confidentiality and integrity of the communication between you (your browser) and the EEAS/EU Delegation. Nevertheless, a residual risk always exists for communication over the internet, including email exchange. The EEAS relies on services provided by other EU institutions, primarily the European Commission, to support the security and performance of the EEAS website.

Security of the online platforms used for video-conferencing is assured by the service providers. The security policy of data processors, such as can be verified at the relevant websites:

- Salesforce: <https://www.salesforce.com/company/privacy/>
- Facebook: <https://en-gb.facebook.com/policy.php>
https://www.facebook.com/help/235353253505947/?helpref=hc_fnav; and
https://about.fb.com/actions/protecting-privacy-and-security/?utm_source=Search&utm_medium=google&utm_campaign=USPublicAffairs&utm_content=Search-fb%20security-510972687502
- Flickr: <https://www.flickr.com/help/terms>
- Instagram: <https://help.instagram.com/519522125107875>, and see Facebook links
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy> and <https://safety.linkedin.com/staying-safe>
- Twitter: <https://twitter.com/en/privacy> and <https://help.twitter.com/en/safety-and-security>
- YouTube/Google : <https://policies.google.com/privacy>
- Zoom: <https://zoom.us/privacy> and <https://zoom.us/trust/security>

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.