

European Data Protection Board (EDPB) Specific Privacy Statement (SPS)

EDPB stakeholder meetings and surveys / questionnaires

Last updated: October 2020

1. Introduction

In order for the EDPB to be able to fulfil its tasks, as stipulated in articles 70 and 71 of the GDPR, it has launched an external stakeholder strategy that involves meeting and collecting feedback from stakeholders on a regular basis. Such strategy involves organising stakeholder meetings with specific purposes (e.g. collecting stakeholders experience on a particular topic the EDPB is planning to provide guidance for and the collection of feedback through surveys and questionnaires). Meetings, stakeholder events and surveys are organised by the EDPB's Secretariat for the performance of its tasks (see article 75(6) GDPR).

In order to gather said feedback, the EDPB is required to process personal data of external stakeholders in order to identify and contact them. Such contact can occur via email or through an online tool (e.g. EU Survey for questionnaires, invitations and calls for expression of interest in an event, and AGM for formal invitations and registration). In certain cases, a processor (e.g. a communication agency) may be engaged to conduct such activities on behalf of the EDPB.

The responsible for this processing operation is the EDPB. The EDPB is processing personal data in compliance with Regulation 2018/1725. Lawfulness is ensured by compliance with articles 5(1)(a) and 5(2) of Regulation 2018/1725. Where participants have agreed to be part of a contact list, lawfulness is ensured by compliance with article 5(1)(d) of Regulation 2018/1725.

Where the EDPB is required to keep data for the purposes of audits and investigations by relevant EU bodies, the lawfulness of said processing rests on article 5(1)(b) and (2) of regulation 2018/1725.

2. What personal information do we collect, for what purpose and through which technical means?

2.1 Processed personal data

2.1.1. To organise stakeholder events, including invitations and calls for expression of interest in participating, the following personal data are collected:

- (a) name and surname of the participant;
- (b) email address;
- (c) professional affiliation;
- (d) professional address and phone number, where required and relevant;
- (e) where events take place in a EU building, personal data required to invite participants and ensure entrance in the building in compliance with security rules in place (e.g. ID card/passport number);
- (f) banking data, where reimbursements are foreseen;

- (g) where events take place remotely, any personal data required by service providers (e.g. videoconferencing providers) to ensure participation in the event;

Some of this personal data may be collected in advance, with the consent of the data subject, to be integrated in a single contact list for this purpose.¹

Attendance of EDPB stakeholder events is not made public. During the events, no participants' lists are distributed, nor are pictures of participants taken, in order to safeguard their privacy.

2.1.2. To gather feedback from stakeholders in the context of stakeholder events:

- (a) name and surname, where relevant;
- (b) email address;
- (c) professional affiliation;
- (d) views expressed by respondents;
- (e) any personal data collected by the service provider of the questionnaire tool to ensure an adequate processing of the replies;

Replies to any surveys are not made public.

2.2 Purpose of the processing

To gather feedback, through events and surveys, from stakeholders, regarding subject matters falling under the work of the European Data Protection Board.

2.3 Technical means

- a) To organise remote meetings, the EDPB relies on external video conferencing systems;
- b) To gather feedback, collect expressions of interest in participating in the event, and ensuring participants' registrations, the EDPB may rely on external systems, such as EU Survey;²
- c) In physical meetings taking place in EU buildings, the EDPB relies on the EC IT system AGM in order to invite participants and ensure access to the building; it is also used to collect banking data in order to reimburse participants, where applicable;³
- d) Email services can be used to contact participants for different reasons, including to answer any queries.

3. Who has access to your information and to whom it is disclosed?

The following entities have, or may have access, to your information:

¹ Please contact the EDPB DPO (see contact details below) if you would like to receive this specific privacy statement.

² For more information on how EU Survey processes your personal data, please see: <https://ec.europa.eu/eusurvey/home/privacystatement>.

³ You can find more information about AGM (Advanced Gateway to your Meetings) here: <https://ec.europa.eu/tools/agm/de/what-agm>, and about how it processes personal data here: <https://ec.europa.eu/dpo-register/detail/DPR-EC-01141>.

- J EDPB Members and staff of the EDPB Secretariat, on a need to do and need to know basis;
- J Service providers, acting as processors on behalf of the EDPB, where necessary in order to perform their services;
- J Bodies charged with a monitoring or inspection tasks in application of EU law, where necessary in the context of official investigations or for audit purposes;
- J Members of the public in the context of requests for access to documents (in accordance with Regulation 1049/2001), where the relevant exceptions do not apply.

4. How do we protect and safeguard your information?

All personal data handled by the EDPB is kept on restricted, password-protected servers, available only to staff, EDPB members and the European Commission, on a need-to-know and need-to-do basis. Physical access to the premises of the EDPB is protected, and restricted to authorised personnel.

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Personal data can only be disclosed to recipients other than EU institutions and bodies in compliance with Article 9(1)(b) of Regulation 2018/1725, and provided that the data subjects have been informed about the processing and about their right to object (Articles 15-16 and 23 of the Regulation).

5. How can you verify, modify or delete your information?

You have the right to request from the data controller (the EDPB) access to, rectification or erasure of your personal data, restriction of processing concerning the data subject or, where applicable, the right to data portability. Please note that the rights provided to data subjects are not absolute rights and may be subject to exceptions, which may be applied on a case-by-case basis.

If you have received an invitation because you are part of our Single Contact List, and you wish to be removed from that list, you can send an email to the contacts listed below.

You can object to the processing of your personal data on grounds relating to your particular situation, by stating said grounds in an email sent to the controller. If the controller (the EDPB) is not able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, the controller will remove the personal data categories indicated in section 2.1 above. The same applies to the processing for the establishment, exercise or defence of legal claims.

To exercise your rights as a data subject, see the “Contact information” section of this SPS below.

6. For how long do we keep your data?

Personal data concerning the event organization are kept for 5 years.⁴ Files that reflect the consultations, discussions and debates launched by the EDPB and results obtained (responses from bodies and individuals consulted) are kept for 5 years.

7. Time limit for addressing your data modification request

The time limit for treating the data subject's request and modifying the database fields is one month. This period may be extended by two further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPB will inform the data subject of the extension within one month of receipt of the request and will provide reasons for the delay.

8. Contact information

In case you have questions, or wish to exercise your rights as a data subject, please contact the European Data Protection Board (the data controller), using the following contact information: edpb@edpb.europa.eu. You can also directly contact the EDPB Data Protection Officer, at edpb-dpo@edpb.europa.eu.

9. Resources

Complaints can be addressed to the European Data Protection Supervisor (EDPS) at the following address:

European Data Protection Supervisor (EDPS)
Rue Wiertz 60
B-1047 Brussels
Belgium
Phone: +32 2 283 19 00
Email: edps@edps.europa.eu

⁴ An exception is made to contact details in the EDPB Single Contact List, which are kept for as long as data subjects wish to be part of said list or until the EDPB is requested its removal for any additional reasons (e.g. change of contact point).