

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

### **EDPB events with stakeholders including meetings and surveys/questionnaires**

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#### **1. Introduction**

In order for the European Data Protection Board (“the EDPB”/“we”/“us”/“our”) to be able to fulfil its tasks, as they are prescribed in Articles 70 and 71 GDPR, we may have to organise events with stakeholders in order to either seek their views and expertise on topics which are of interest to our work or in order for us to provide such stakeholders with information on a relevant topic. Such events or meetings can be in person or on line, or we may seek the views of stakeholders through surveys and questionnaires.

This privacy statement explains how we process personal data to organise such events with stakeholders including any follow up actions.

#### **2. Who is responsible for the processing of your personal data and under which legal grounds is it processed?**

The EDPB is the controller for the processing of personal data for the purposes of events with stakeholders.

For the purposes of **organisation, management and follow-up** of an event, we process your personal data for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725<sup>1</sup>.

<sup>1</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and

More specifically, as explained above, events and meetings with stakeholders as well as surveys/questionnaires are organised in order for the EDPB to fulfil its tasks under Articles 70 and 71 GDPR.

For the purposes of **participation** (including being part of a contact list), **publication** and **dissemination** of the event we rely on your consent, in accordance with Article 5(1)(d) and Article 7 of Regulation (EU) 2018/1725.

You will only be photographed for communication purposes including publications on EDPB website and the EDPB social media accounts, based on your consent. If we decide to video-record the event, you will be included in such recording only if you provide us with your consent. You may provide such consent via the registration form and via a sticker system. Video recordings of speakers may be published on the EDPB website and the EDPB social media accounts, based on your consent collected with the registration form.

We may also be required to process your personal data to comply with a legal obligation under Article 5(1)(b) and (2) of Regulation (EU) 2018/1725. This could be, for instance, when a relevant EU body (e.g., European Court of Auditors) carries out an audit or investigation, when we handle requests for access to documents under Regulation (EC) 1049/2001<sup>2</sup> or if you request to exercise your data subject rights under Regulation (EU) 2018/1725.

In case your personal data is published on the X (Twitter) or LinkedIn accounts of the EDPB, Twitter and LinkedIn might carry out further processing of those data for which they are separate controllers<sup>3</sup>.

In case Cisco Webex is used as a video-conferencing tool, the European Parliament (EP) is a separate controller regarding the processing of personal data via Cisco Webex<sup>4</sup>.

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

#### ***3.1 Processed personal data***

To organise stakeholder events, including sending invitations and calls for expression of interest in participating, we may process the following personal data:

- (a) your name and surname;
- (b) your email address;
- (c) your professional affiliation;
- (d) your role/occupation;
- (e) your professional address and phone number;

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on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (Text with EEA relevance.).

<sup>2</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

<sup>3</sup> To learn more about how these platforms process your personal data, we encourage you to read their privacy policies <https://www.linkedin.com/legal/privacy-policy> and <https://twitter.com/en/privacy>.

<sup>4</sup> For more information on processing of personal data via Cisco Webex, please consult the [European Parliament \(hereinafter “EP”\) data protection statement](#).

- (f) where events take place in a EU building, personal data required to invite you and ensure your access in the building in compliance with security rules in place (e.g. ID card/passport number);
- (g) your banking data, where reimbursement is foreseen;
- (h) where events take place remotely, any personal data required by service providers (e.g. videoconferencing providers) to ensure participation in the event;
- (i) photo and biography of the speakers for reference;
- (j) material (e.g. slides) that may be shared with participants after the event;
- (k) any comments that you may type in the chat function of the conferencing tool;
- (l) where applicable, photographs and audio-video recording of speakers participating in the panel of the Conference, as well as of participants participating in the event and in the Q&A sessions.

With your consent, we may collect in advance some of the above personal data to be integrated in a single contact list for this purpose<sup>5</sup>.

To gather written feedback from stakeholders via a survey or a questionnaire, including as a follow up action after an event or meeting, the following personal data might be processed:

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

Your replies to our surveys or questionnaires will not become public. However, we might include your feedback in an aggregated form in documents, which could be communicated to the EDPB members or become public such as statistics or reports. We will make sure that your feedback included in such public documents cannot be attributed to you.

### ***3.2 Purpose of the processing***

To exchange feedback and expertise, through events and surveys, with stakeholders, regarding subject matters falling under the work of the EDPB.

### ***3.3 Technical means***

- a) To organise remote meetings, we may rely on external video conferencing systems such as webmeeting or CISCO Webex;
- b) To gather feedback, collect expressions of interest in participating in the event, and ensuring participants' registrations, we may rely on external systems, such as EU Survey<sup>6</sup>;

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<sup>5</sup> Please contact the EDPB DPO (see contact details below) if you would like to receive this specific privacy statement. <sup>6</sup> For more information on how EU Survey processes your personal data, please see: <https://ec.europa.eu/eusurvey/home/privacystatement>.

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- c) In physical meetings taking place in EU buildings, we rely 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<sup>7</sup>;
- d) Email services can be used to contact participants for different reasons, including to answer any queries.

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

The following entities/individuals may have access, to your information:

- The EDPB Secretariat, on a need to do and need to know basis;
- Members of the Board, where necessary;
- Service providers, usually acting as processors on behalf of the EDPB, where necessary in order to perform their services such as:
  - the European Commission as a processor for providing the EU Survey tool;
  - the European Parliament as a controller upon providing Cisco Webex or as a processor when using Webmeeting;
- Bodies charged with monitoring or inspection tasks in application of EU law, e.g. OLAF, European Ombudsman, EDPS as a supervisory authority, Court of Auditors, as well as staff of other services, where necessary in the context of official investigations or for audit purposes;
- The Court of Justice of the European Union, where necessary;
- Members of the public in the context of requests for access to documents, in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83<sup>8</sup>.

#### 5. Are there any transfers of personal data outside of the EU/EEA to countries for which there is no adequacy decision by the European Commission?

Transfers of personal data outside of the EU/EEA occur upon using Cisco Webex in the following situations:

- For media node processing to provide the real time audio/video/chat processing: [Based on host or attendee location: Cisco and/or its affiliates contracted to provide data center services in: (Brazil), (Australia), (Singapore)]: Processing real-time meeting data such as VoIP, video and high frame rate sharing data (transient processing).
- For Technical Support Assistance: data storage Aricent (India), Estarta (Jordan), Sykes (Costa Rica and Colombia), Concentrix (US) for support provision: TAC Support Information.

The legal basis (transfer tool) for transfers to countries outside of EU and EEA for which there is no adequacy decision by the European Commission is the Standard Contractual Clauses for international

<sup>7</sup> 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>.

<sup>8</sup> Council Regulation (EEC, Euratom) No 354/83 of 1 February 1983 concerning the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community.

transfers, with supplementary measures implemented, as described in Article 11 of the EP-Cisco SELA in conjunction with Annex 3e.

## 6. How do we protect and safeguard your information?

We keep our copies of your personal data on restricted and password-protected servers, with access limited on a need-to-know or need-to-do basis. Physical access to our premises is protected and restricted to authorised personnel only.

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

As the individual to which the personal data relates, you can exercise the following rights:

1. access to your personal data under Article 17 of Regulation (EU) 2018/1725;
2. rectify your personal data under Article 18 of Regulation (EU) 2018/1725;
3. erase your personal data under Article 19 of Regulation (EU) 2018/1725;
4. restrict the processing concerning yourself under Article 20 of Regulation (EU) 2018/1725; or
5. exercise the right to data portability under Article 22 of Regulation (EU) 2018/1725.

Please note that these rights are not absolute rights, which means that some exceptions may apply. These rights are applied on a case-by-case basis.

In addition, you can object to the processing of your personal data under Article 23 of Regulation (EU) 2018/1725 for reasons relating to your particular situation. When you contact us to exercise this right, please explain these reasons. We will remove your personal data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms.

To exercise your rights as a data subject, please see sections 9 and 10 below.

For any processing of your personal data based on your consent, you can withdraw your consent at any time, without any consequence, and as easily as you have provided it (i.e. by sending an email to the contacts indicated in section 9 below). However, please be aware that this will not affect the lawfulness of the processing based on your consent prior to withdrawing it. Further, please be aware that in case of publication on our social media accounts, the respective rules of LinkedIn<sup>9</sup> and X (Twitter)<sup>10</sup> as to deletion will also apply to any data held by them and over which they are considered the controller.

## 8. For how long do we keep your data?

Personal data concerning the event organization are kept for 5 years<sup>11</sup>. Files that reflect the discussions and debates as well as the results obtained (responses from bodies and individuals consulted) are kept for 5 years with the exception of any chat which is deleted after the event (if retained, it is anonymised).

Your personal data may be part of documents with historical or administrative value, which are selected for preservation in the EDPB records. In this case the personal data they contain will be kept

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<sup>9</sup><https://www.linkedin.com/help/linkedin/answer/a522451/unable-to-retrieve-deleted-articles?lang=en-us&intendedLocale=en>

<sup>10</sup> <https://help.twitter.com/en/using-x/delete-posts>

<sup>11</sup> 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).

indefinitely and - unless an exemption applies - be made public in accordance with Regulation (EEC, EURATOM) 354/83 on the opening to the public of historical archives after 30 years.

## 9. Time limit for addressing your data modification request

After receiving your request, we have one month to provide information on action taken on your request. We may extend this period by two further months, taking into account the complexity and number of the requests. In that case, we will inform you of the extension and its reason within one month of receipt of your request.

## 10. Contact information

If you have questions, or wish to exercise your rights as a data subject, please contact us at [edpb@edpb.europa.eu](mailto:edpb@edpb.europa.eu) or via our [website's](#) contact page (selecting the option “Requests for the EDPB DPO”).

## 11. Who can you contact to complain about the processing of your personal data?

We encourage you to always contact us first to raise your questions or concerns. In any case, you remain entitled to send a complaint to the European Data Protection Supervisor (EDPS) using the following contact information:

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