

EDPB Personal data records of processing activities (Article 31 of the Regulation 2018/1725<sup>1</sup>)

Record of EDPB activities processing personal data, based on Article 31 of 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 on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

Nr.	Item	Description
1.	<b>Title of the processing operation</b>	EDPB X (Twitter) account
2.	<b>Number of record</b>	EDPB-0007
3.	<b>Last updated</b>	November 2023
4.	<b>Data controller</b>	European Data Protection Board <a href="mailto:Edpb[at]edpb.europa.eu">Edpb [at] edpb.europa.eu</a> Rue Montoyer, 30 Belgium, Brussels  X is a separate controller for the processing of personal data on which it determines the means and the purposes: <a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a>
5.	<b>Joint controllers</b>	N/A
6.	<b>Processor(s)</b>	N/A

<sup>1</sup> Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the EU institutions, bodies, offices and agencies.

7.	<b>Data Protection Officer (DPO)</b>	<p>EDPB Data Protection Officer  <a href="mailto:Edpb-dpo@edpb.europa.eu">Edpb-dpo@edpb.europa.eu</a>  Rue Montoyer, 30  Belgium, Brussels</p>
8.	<b>Description of the processing operation</b>	<p>The EDPB uses the social media channel X to regularly inform the public about its activities, raise awareness about data protection issues and direct citizens to the appropriate EDPB communication channels whenever necessary. Users sign up to X on a voluntary basis and subject to its terms of use and privacy policies. The use of X by the EDPB as a communication platform is a complementary communication approach, aimed at reaching audiences that may not necessarily use websites, in particular official websites of EU institutions, as their primary source of information about the activities of those institutions. The EDPB does not contact users of X using the Direct Messaging mechanisms. The EDPB does not use statistics' services of X. However, in certain circumstances, it may gather specific information, such as the number of likes and retweets on a given post, to measure engagement with posts. The e-mail account used for the creation of the EDPB's account on X is a functional mailbox and therefore no personal data of EDPB Secretariat staff members are processed in this context.</p> <p>In general, the EDPB does not collect any personal data of users of X engaging with the EDPB. Only in certain circumstances are data collected and stored by the EDPB (e.g. sharing of a specific comment on X with the Plenary, or an Expert Subgroup or Secretariat staff members, for communication purposes, such as understanding the public's reaction to an EDPB document for the purpose of ensuring proper communication).</p>
9.	<b>Purpose of processing operation</b>	<p>The purpose is to communicate with the general public about EDPB activities, raise awareness about data protection issues and direct citizens with questions to appropriate EDPB communication channels (e.g. EDPB "contact us" page on the EDPB website).</p> <p>Content from X could occasionally be shared with EDPB members or the EDPB Secretariat for communication purposes, such as understanding the public's reaction to an EDPB document for the purpose of ensuring proper communication. In these cases, such content may also be processed for record keeping purposes.</p>

10.	<b>Legal basis</b>	The EDPB Secretariat, which manages the account on X, is responsible for the communication with other institutions and the public, pursuant to Article 75(6)(c) GDPR. As a result, lawfulness of processing is ensured by compliance with Article 5(1)(a) and (2) of Regulation 2018/1725.
11.	<b>Description of categories of data subjects</b>	<p>The EDPB Chair, its Vice-Chairs, the Head of the EDPB Secretariat or other members of the EDPB, the Coordinated Supervision Committee (“CSC”) <sup>(2)</sup> or the EDPB Secretariat staff as well as the EC Commissioners and MEPs in relation to their activities under their respective roles.</p> <p>Users of X who interact with the EDPB account on X, either by means of questions, comments, retweets and/or likes or users of X who react to a tweet or comment or answer where the EDPB is tagged.</p>
12.	<b>Description of processed personal data / categories</b>	<ul style="list-style-type: none"> <li>• We may post information on the EDPB Chair, its Vice-Chairs, the Head of the EDPB Secretariat or other members of the EDPB, the CSC or the EDPB Secretariat staff as well as the EC Commissioners and MEPs in relation to their activities under their respective roles e.g. refer to their public speaking engagements.</li> <li>• In relation to users of X when interacting with the EDPB account on X, we may process the following categories of personal data: <ul style="list-style-type: none"> <li>○ their names and surnames;</li> <li>○ any other personal data made available by these users of X, such as, but not limited to, their X handle (i.e., username), contact details, picture, views, questions addressed to the EDPB;</li> </ul> </li> <li>• We may also process data in relation to other users of X and their reaction to a tweet or comment or answer where the EDPB is tagged (like, share, comment).</li> </ul> <p>It cannot be excluded that users of X post information that fall in one of the special categories of personal data. This is not under the control of EDPB and it would fall outside of our intended use of X, as described above. In such a case, we will ask the person to delete this information and we will propose alternative channels for such submissions e.g. by indicating to them the Supervisory Authority that they could contact in this respect.</p>

<sup>2</sup> [https://edpb.europa.eu/csc/about-csc/who-we-are-coordinated-supervision-committee\\_en](https://edpb.europa.eu/csc/about-csc/who-we-are-coordinated-supervision-committee_en)

13.	<b>Description of procedure to ensure data subjects' rights</b>	A specific privacy statement detailing the EDPB use of X is published on the EDPB website.
14.	<b>Description of recipients of personal data</b>	<p>Personal data contained in the EDPB's posts on X are publicly available and can be visible to both registered and unregistered users of X. With the exception of personal data of EDPB members about whom we may publish posts, we only process personal data which users of X have already made public.</p> <p>In addition, as indicated above, any content on X which we may share within the EDPB for communication purposes can also be accessible, in particular, to:</p> <ul style="list-style-type: none"> <li>• The EDPB Secretariat, on a need to do and need to know basis;</li> <li>• Members of the Board, where necessary;</li> <li>• The European Commission, where necessary, in the context of its participation in the EDPB activities;</li> <li>• Bodies charged with a monitoring or inspection task in application of EU law, e.g. OLAF, Ombudsman, EDPS, Court of Auditors, as well as staff of other services, where necessary in the context of official investigations or for audit purposes;</li> <li>• The Court of Justice of the European Union, where necessary;</li> <li>• 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>3</sup>.</li> </ul>
15.	<b>Description of international transfers</b>	The EDPB does not transfer any of the personal data that may be processed in the context of the use of its X account.

<sup>3</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.

16.	<b>Description of envisaged time limits for retention for each processing operation</b>	<p>Personal data processed in the context of any interactions between users of X and the EDPB account on X are kept on the account for as long as the EDPB account on X exists, unless said users decide to delete their post or account, subject to usage policies of X<sup>4</sup>.</p> <p>Any comments, views, X handles (i.e., usernames) or other personal data that the EDPB may extract from X for the purposes mentioned above are kept for a maximum of two years, after which if they are part of documents with historical or administrative value, which are selected for preservation in the EDPB records, the personal data they contain will be kept 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.</p>
17.	<b>General description of technical and organisational security measures referred to in Article 33</b>	<p><u>IT Measures</u></p> <p>The EDPB account on X is password protected. The EDPB Secretariat staff members who have access to its account on X only connect to this account via their professional devices. Copies of personal data held by the EDPB are kept in restricted access servers, available only to authorised staff through adequate IT security measures. In general, technical measures include appropriate actions to address online security, protect server hardware, software and the network from accidental or malicious manipulations and risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. The EDPB account has disabled the option for direct messages, therefore no additional personal data that has not already been made public are processed via this account. No personal data beyond what is intentional for the posting on X are processed. Further, the staff having access to the account limits the posting of information that could qualify as personal data to the minimum necessary.</p> <p><u>Organisational measures</u></p> <p>The EDPB used a functional mailbox email address to create its account on X to avoid the processing of personal data. The account is used solely to communicate information / raise awareness about EDPB activities. Posts on X are not signed.</p> <p>As indicated above, in general, the EDPB does not collect any personal data of users of X engaging with the EDPB. Only in certain circumstances are data stored in the EDPB servers (e.g. sharing of a specific comment on X with the</p>

<sup>4</sup> <https://help.twitter.com/en/managing-your-account/how-to-deactivate-x-account#deactivating-vs-deleting>  
<https://help.twitter.com/en/using-x/delete-posts>

		Plenary, or an Expert Subgroup or Secretariat staff members, for communication purposes, such as understanding the public's reaction to an EDPB document).
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