

EDPB Personal data records of processing activities (Article 31 of Regulation 2018/1725¹)

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.	Title of the processing operation	EDPB LinkedIn Page
2.	Number of record	EDPB-0008
3.	Last updated	December 2023
4.	Data controller	European Data Protection Board Edpb [at] edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels LinkedIn Ireland Unlimited Company Wilton Place, Dublin 2, Ireland https://www.linkedin.com/help/linkedin/ask/PPQ?lang=en
5.	Joint controllers	LinkedIn Ireland Unlimited Company is a joint controller in relation to the production of anonymous statistics.

¹ 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.

6.	Processor(s)	N/A
7.	Data Protection Officer (DPO)	<p>EDPB Data Protection Officer Edpb-dpo@edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels</p>
8.	Description of the processing operation	<p>The EDPB uses the social media channel LinkedIn 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 LinkedIn on a voluntary basis and subject to its terms of use and privacy policies. The use of LinkedIn by the EDPB as a communication platform is a complementary communication approach, aimed at reaching audiences that may not necessarily use other websites, in particular official websites of EU institutions, as their primary source of information about the activities of those institutions. The Direct Messaging mechanisms for the EDPB page is disabled, therefore direct messages are neither sent or received by the EDPB. LinkedIn provides us with anonymous statistics on the demographics of those interacting with our posts as well as well on link clicks, engagement rate and overview of evolution of posts over time.</p> <p>In general, the EDPB does not collect any personal data of users of LinkedIn engaging with the EDPB. Only in certain circumstances are data collected and stored by the EDPB (e.g. sharing of a specific comment on LinkedIn with either the members of the EDPB participating in the Plenary, with an Expert Subgroup or with EDPB Secretariat staff members, where such sharing is done for communication purposes, such as understanding the public’s reaction to an EDPB document for the purpose of ensuring proper communication).</p>
9.	Purpose of processing operation	<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). In that context, and to improve our interaction with the public, we consult the anonymous statistics that LinkedIn provides in relation to the engagement of users with the EDPB Page.</p> <p>Content from LinkedIn could occasionally be shared with the staff members of the EDPB or the EDPB Secretariat staff members for communication purposes, such as understanding the public’s reaction to an EDPB document for</p>

		<p>the purpose of ensuring proper communication. In these cases, such content may also be processed for record keeping purposes.</p> <p>Occasionally the EDPB may use its Page on LinkedIn to inform the public of matters not strictly related to its core business, e.g. when publishing information on the bluebook traineeship posts available at the EDPB Secretariat.</p>
10.	Legal basis	<p>We use our LinkedIn Page 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. the EDPB “contact us” page on the EDPB website). In that context, and to improve our interaction with the public, we consult the anonymous statistics that LinkedIn provides about the engagement of users with the EDPB Page. For these uses, the processing of personal data is based on the necessity of that processing performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body as set out under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725². The task in question is the responsibility of the EDPB Secretariat, which manages the EDPB Page on LinkedIn, for communications with other institutions and the public, as provided in Article 75(6)(c) GDPR.</p> <p>When posting information on matters not strictly relating to the EDPB core business, the lawfulness of the processing is based on the data subject’s consent for the processing of their personal data for one or more specific purposes as set out under Article 5(1)(d) of Regulation (EU) 2018/1725.</p> <p>The EDPB is required to store and further process personal data in the context of any audits or enquiries by specific EU bodies, as foreseen in the applicable legal provisions. In such cases, lawfulness of processing is based on the necessity of such processing for compliance with a legal obligation to which the EDPB is subject under Article 5(1)(b) and 5(2) of Regulation 2018/1725. The legal obligations are foreseen in different legislation applicable to the different institutions responsible for auditing and inspections.</p>

² 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 (Text with EEA relevance.).

11.	Description of categories of data subjects	<ul style="list-style-type: none"> • The EDPB Chair, its Deputy Chairs, the Head of the EDPB Secretariat or staff members of the EDPB, the Coordinated Supervision Committee (“CSC”)³ or the EDPB Secretariat in relation to their activities under their respective roles. We may also refer to the persons with whom they may hold meetings (e.g. EC Commissioners, MEPs). • Users of LinkedIn who interact with the EDPB Page on LinkedIn, either by means of questions, comments, shares, reposts and/or likes or users of LinkedIn who react to a post or comment or answer where the EDPB is tagged. • The EDPB Secretariat staff members who manage the EDPB Page. • Any other external people (i.e. people other than the staff members of the EDPB or of the CSC or of the EDPB Secretariat) who might be relevant for posts not strictly related to the core business of the EDPB.
12.	Description of personal data/categories processed by the EDPB as a controller	<ul style="list-style-type: none"> • As provided by the Terms of LinkedIn, the creation of the EDPB Page on LinkedIn required the EDPB staff members who manage it to link the page to their personal LinkedIn account⁴. These staff members have linked their professional EDPB email addresses to the EDPB LinkedIn Page. • We may post information on the EDPB Chair, its Deputy Chairs, the Head of the EDPB Secretariat or other staff members of the EDPB, the CSC or the EDPB Secretariat in relation to their activities under their respective roles, e.g. by referring to their public speaking engagements and including references to (and personal data about) the persons (e.g. EC Commissioners, MEPs) with whom they may hold meetings. • In relation to users of LinkedIn who interact with the EDPB Page on LinkedIn, we may process the following categories of personal data: <ul style="list-style-type: none"> ○ their names and surnames;

³ https://edpb.europa.eu/csc/about-csc/who-we-are-coordinated-supervision-committee_en

⁴ <https://www.linkedin.com/legal/linkedin-pages-terms>

		<ul style="list-style-type: none"> ○ any other personal data made available by these users of LinkedIn, such as, but not limited to, their LinkedIn username, contact details, picture, views, questions addressed to the EDPB as well as their reactions to a post or comment or answer where the EDPB is tagged (like, share, repost comment); • LinkedIn produces anonymous statistics in relation to the demographics of the users interacting with the EDPB Page as well as clicks, engagement rate and overview of evolution of posts over time. This includes the user’s job function, country, industry, seniority, company size, and employment status data, as well as whether a person is following the page or not. • In case of processing not strictly related to the core business of the EDPB, such as to promote the bluebook traineeship posts of the EDPB Secretariat, we may post additional categories of personal data relating to the specific purpose such as: <ul style="list-style-type: none"> ○ the photo of a former bluebook trainee; ○ the period during which they worked with us; and ○ their testimony relating to their working experience while working at the EDPB Secretariat. <p>It cannot be excluded that users of LinkedIn post information that fall in one of the special categories of personal data. This is not under the control of the EDPB and it would fall outside our intended use of LinkedIn, 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>
13.	Description of procedure to ensure data subjects’ rights	A specific privacy statement detailing the EDPB use of LinkedIn will be published on the EDPB website.
14.	Description of recipients of personal data	<p>Personal data contained in the EDPB’s posts on LinkedIn are primarily visible to registered users of LinkedIn. LinkedIn also allows unregistered users to view only a limited number of pages, who may therefore be able to view some of the personal data contained in the EDPB’s posts.</p> <p>In addition, any content on LinkedIn which we may share within the EDPB for communication purposes can also be accessible, in particular, by:</p>

		<ul style="list-style-type: none"> • The EDPB Secretariat staff members on a need to do and need to know basis; • Members of the EDPB, where necessary; • The European Commission, where necessary, in the context of its participation in the EDPB activities; • Bodies charged with a monitoring or inspection task in application of EU law, e.g. OLAF, European Ombudsman, EDPS, 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) 354/83⁵.
15.	Description of international transfers	LinkedIn may transfer outside of the EU any personal data processed for the purpose of producing anonymous statistics. LinkedIn has adhered to the EU-U.S. Data Privacy Framework (DPF).
16.	Description of envisaged time limits for retention for each processing operation	<p>Personal data processed in the context of any interactions between users of LinkedIn and the EDPB Page on LinkedIn are kept on that page for as long as the EDPB Page on LinkedIn exists, unless said users decide to delete their post or account, subject to usage policies of LinkedIn⁶.</p> <p>Unless such comments are selected for preservation in the EDPB records (as described below), any comments, views, LinkedIn usernames or other personal data that the EDPB may extract from LinkedIn for the purposes mentioned above are kept for a maximum of two years. Further, and unless such personal data are selected for preservation in the EDPB records (as described below), we may also keep a copy of personal data that is uploaded to LinkedIn for a maximum period of two years.</p>

⁵ 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.

⁶ <https://www.linkedin.com/help/linkedin/answer/a522451/unable-to-retrieve-deleted-articles?lang=en-us&intendedLocale=en-us>
<https://www.linkedin.com/help/linkedin/answer/a1336281/data-retention?lang=en-us&intendedLocale=en-us#:~:text=If%20you%20close%20your%20account,noted%20in%20our%20Privacy%20Policy.>

		<p>At the end of these retention periods, if the personal data contained in the documents has historical or administrative value and is selected for preservation in the EDPB records, the selected personal data will be kept indefinitely and – unless an exemption applies – will 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.	<p>General description of technical and organisational security measures referred to in Article 33</p>	<p><u>IT Measures</u> Access to the EDPB Page on LinkedIn is password protected. The EDPB Secretariat staff members who manage the page only connect to it via their professional devices. Copies of personal data held by the EDPB are kept in restricted access servers, available only to authorised staff through appropriate IT security measures. In general, technical measures include appropriate actions to address online security; to protect server hardware, server software and the network from accidental or malicious manipulations; and to protect from the risk of data loss, alteration of data or unauthorised access. The appropriateness of these measures takes into consideration the risk presented by the processing and the nature of the personal data being processed. The EDPB has disabled the option for Direct Messages, therefore no additional personal data that has not already been made public are processed via this Page. Further, the EDPB Secretariat staff members managing the Page limit the posting of information that could qualify as personal data to the minimum necessary.</p> <p><u>Organisational measures</u> The EDPB LinkedIn Page is used primarily to communicate information/raise awareness about EDPB activities and very rarely is it used for other purposes. Posts on LinkedIn are not signed.</p> <p>The EDPB’s processing of LinkedIn users’ personal data will only occur in very limited circumstances, as set out above, and the statistics received or used by the EDPB are anonymous.</p> <p>Only in certain circumstances are data stored in the EDPB servers (e.g. sharing of a specific comment on LinkedIn with either the members of the EDPB participating in the Plenary, with an an Expert Subgroup or with EDPB Secretariat staff members, where such sharing is done for communication purposes, such as understanding the public’s reaction to an EDPB document for the purpose of ensuring proper communication).</p>