## Record of processing activity

### Part 1

<table>
<thead>
<tr>
<th>Name of the data processing</th>
<th>Contact Management Data base (Dynamics)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Created on</td>
<td>29/04/2020</td>
</tr>
<tr>
<td>Last update</td>
<td>[dd/mm/yyyy]</td>
</tr>
<tr>
<td>Reference number</td>
<td>076</td>
</tr>
<tr>
<td>Year</td>
<td>2020</td>
</tr>
</tbody>
</table>

1. **Controller:** European Economic and Social Committee

2. **Service responsible:**
   
   - **2a) Service responsible:** DIR. D
   
   - **2b) contact details:** dynamics-eesc@eesc.europa.eu

3. **Joint controller:**
   
   [please indicate name/function and contact details (where applicable)]

4. **DPO: contact details:** data.protection@eesc.europa.eu

5. **Processor(s) (where applicable):**
   
   The EESC makes use of ClickDimensions (an email marketing tool that allows emails to be created and sent, as well as statistics to be generated). [https://clickdimensions.com/about/contact/](https://clickdimensions.com/about/contact/)

6. **Purpose(s) of the data processing:**
   
   Dynamics is a tool and information channel that facilitates:
   - stakeholder relationship management;
   - information about the EESC’s work to be communicated through newsletters, press releases, announcements about adopted opinions and similar types of mass mailing;
   - event management (invitation, registration and follow-up) and the conduct of surveys;
   - internal communication.

7. **Description of the categories of persons whose data are processed:**
   
   Participants to events, recipient of communications, ...
| 8. Description of data categories processed | Depending on the purpose for which the personal data are collected, the following categories can be collected: last name, first name, gender, languages, organisation, country represented, department, office, job title, title, email address, phone and fax number, mobile phone, street, number, P.O. box, postal code, city, town, area, country, roles, and areas of interest.

Dynamics also logs information on whether emails have been received or opened, and if any links in the email have been clicked upon. This is done to allow the EESC to collect statistical data on its email campaigns. |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Time limit for retaining the data</td>
<td>The retention period depends on the purpose for which the personal data are collected. If the personal data have been collected for the purpose of organising an event, it will be kept only for the period necessary for the organisation and management of that event, unless participants have agreed to receive further emails from the EESC (for example, invitations to future events or newsletters). Data subjects can always unsubscribe from receiving emails from the EESC via the unsubscribe link.</td>
</tr>
<tr>
<td>10. Recipients of the data</td>
<td>The recipients are EESC staff who use Dynamics in their communication activities and employees of the contractor (who nevertheless do not have direct access to the database), bound by the provisions on confidentiality and the processing of personal data, which are part of the framework contract between the EESC and the contractor for assistance in managing the content of the contact database.</td>
</tr>
<tr>
<td>11. Transfers of personal data to a third country or an international organisation</td>
<td>The personal data are not transferred to non-EU Member States or to international organisations, unless data subjects have given their specific consent for such a transfer or the European Commission has adopted a decision that determined that the third country offers an adequate level of data protection or other adequate safeguards have been put in place for the protection of personal data.</td>
</tr>
<tr>
<td>12. General description of security measures, where possible</td>
<td>Include a general description of your security measures that you could also provide to the public</td>
</tr>
<tr>
<td>13. Privacy statement</td>
<td>Click here to insert a hyperlink</td>
</tr>
</tbody>
</table>

[Add the link to the privacy statement document]

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Part 2

Compliance check and risk screening

1.a) Legal basis and reason for processing

- [x] necessary for the performance of a task carried out in the public interest
- (a) or in the exercise of official authority vested in the Union institution or body
- (b) necessary for compliance with a legal obligation to which the controller is subject (see point 1b) below
- (c) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data
subject prior to entering into a contract
- the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- necessary in order to protect the vital interests of the data subject or of another natural person

[Tick (at least) one of the boxes]

<table>
<thead>
<tr>
<th>1b) Legal basis</th>
<th>Regulation (EU) No 2018/1725 applies to the processing of personal data collected for the purposes mentioned above.</th>
</tr>
</thead>
</table>

2. Are the purposes specified, explicit and legitimate? yes

3. Where information is also processed for other purposes, are you sure that these are not incompatible with the initial purpose(s)? N.A

4. Do you really need all the data items you plan to collect? yes

5. How do you ensure that the information you process is accurate? 

6. How do you rectify inaccurate information? 

7. Are they limited according to the maxim “as long as necessary, as short as possible”? 

8. If you need to store certain information for longer, can you split the storage periods? 

9. How do you inform data subjects? Privacy statements

| e.g. privacy statements on forms, email notifications |

10. Access and other rights of persons whose data are processed 

Data subjects have the right to request access to their personal data. Also, they have the right to request rectification or erasure or restriction of the processing of their personal data.

Where applicable, they have the right to object to the processing of their data. Where applicable, they have the right to receive their personal data provided to the controller or to have their personal data transmitted directly to another controller (data portability). They also have the right to withdraw their consent at any time.

They can direct their queries to dynamics-eesc@eesc.europa.eu. The query will be dealt with within 15 working days.

intranet.eesc.europa.eu/EN/A/moda/Lists/EESC Register of data processing operations/Item/editifs.aspx?List=4e88cf56-b4f9-44a3-8cd0-b1b7b8... 3/4
11. Does this process involve any of the following?

- [ ] (a) data relating to health, (suspected) criminal offences or other special categories of personal data
- [ ] (b) evaluation, automated decision-making or profiling
- [ ] (c) monitoring data subjects
- [ ] (d) new technologies that may be considered intrusive

### Part 3

**Linked documentation**

1. Links to threshold assessment and DPIA (where applicable)
   - Click here to insert a hyperlink
   - [If you have carried out a threshold assessment and/or DPIA, refer to them here]

2. Where are your information security measures documented?
   - Click here to insert a hyperlink

3. Links to other documentation
   - Click here to insert a hyperlink
   - [Please provide links to other documentation related to this process (e.g. project documentation, handbook)]

4. Other relevant documents
   - 

[Save] [Cancel]