

Record of processing activity

Social Media use by the EESC

1. General Information

Name of the data processing:	Social Media use by the EESC
Reference number:	E119
Last update:	19/12/2023
Controller:	European Economic and Social Committee
Directorate:	Directorate D
Unit:	D3 INF
Contact details:	Directorate D Social Media Team, Online Information Unit: Rue Belliard/Belliardstraat 99-101, 1040 Brussels
Joint controller (where applicable):	N/A
Joint controllership agreement (where applicable):	N/A
DPO - contact details	EESC Data Protection
Processor(s) (where applicable):	- Emplifi
Data Processing Agreement	Article 5.1.a of the EUDPR

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The purpose of the processing is to facilitate online communication activities led by the EESC through widely used social media platforms, and to analyse how social media users react to the EESC's policies and initiatives. The processing of personal data by the EESC follows users' voluntary registration, which is subject to the terms and conditions of each social media platform.</p> <p>The EESC uses widely available social media platforms to publish information and raise awareness about its activities, and engage directly with citizens by replying</p>
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	<p>to their comments and questions.</p> <p>Through the Emplifi social media monitoring tool acquired via the Dynamic Purchasing System (DPS) DIGIT/2023/DPS/0001 for Software for Innovation, Diversity and Evolution III (SIDE III), the EESC processes and analyses aggregated data and statistics as well as publicly available data from posts by authors who have agreed to the terms and conditions of the various social media platforms (e.g., LinkedIn, Instagram, Facebook, X). While the external services provider collects the personal data on behalf of the EESC, the EESC only analyses and uses aggregated data and statistics. Individual quotes may however, be captured as examples and used to describe the general attitude towards the European Union in general and the EESC in particular on social media. These quotes are anonymised by removing the profile picture and name, except when they are by public figures, individuals who publish posts about the European Union in their professional capacity, or influencers. Data gathered through the social media networks is used for communication activities, such as coordinating social media presence, statistical and analytical purposes, as well as the promotion of the EESC's communication campaigns and related activities. This can be achieved through:</p> <ul style="list-style-type: none"> - Engaging: interacting with social media users and responding to their queries. - Advertising: raising awareness about the EESC's policies and opportunities for participation in the EU decision-making process. - Identifying and collaborating with influencers (defined by reach, number of followers, engagement and topic) who can promote the EESC's activities online. - Reporting and optimisation: analysing the performance of posts and improving the EESC's online communication and engagement on social media.
Categories of persons whose personal data are processed	<p>* Internal to the organisation Officials and staff members of the EESC who engage on European topics via social media platforms</p> <p>* External to the organisation Any natural person, external to the EESC, wishing to engage on European topics via social media platforms. These may include:</p>

	<ul style="list-style-type: none"> - Officials of other EU institutions, bodies, offices and agencies - Staff of other EU institutions, bodies, offices and agencies - Journalists - Members of the public - Contractors - Others
Categories of personal data processed	<p>Depending on the circumstances and on the social media platform in question, the EESC or its processors may collect and further process the following categories of data:</p> <p>1) Personal data derived from the user profiles:</p> <ul style="list-style-type: none"> - identification data: name and surname, username, user identification, geographical area, age, gender and other personal characteristics such as marital status, nationality; - professional and educational background: occupation, employment history, academic record, etc.; - online identifiers: device ID, IP address and/or cookie identifier; <p>2) Personal data available about users of social media platforms through their networks and connections: engagement, reach and sentiment, comments, shares of users on a specific topic, networks and connections;</p> <p>3) Unsolicited personal data processed via a third-party platform, app or a website (connected to a social media platform) that may be obtained when a user visits or uses their services;</p> <p>4) Personal data available via audiovisual content that might be published on the social media platforms: information in or about the content provided by a user (e.g. metadata), such as the location of a photo or the date a file was created, voice recordings, video recordings, or an image of a data subject.</p>
Recipients of the personal data	<ul style="list-style-type: none"> * Within the EESC - Authorised services of the EESC involved in social media monitoring and related communication activities * Outside the EESC

	<p>- Contractors involved in social media monitoring and related communication activities of the EESC</p>
Transfers of personal data to a third country or an international organization	<p>Personal data are transferred to the United States, where the Social Marketing Cloud used by the Emplifi software platform is hosted in the AWS Cloud. The European Commission has adopted a decision that determined that the United States (commercial organisations participating in the EU-US Data Privacy Framework) offers an adequate level of data protection (see relevant Adequacy Decision in the following link: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en and relevant records in the Data Privacy Framework List in the following link https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000GnS9AAK&status=Active and https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000TOWQAA4&status=Active).</p>
Retention period of the personal data	<p>After initially being processed by the Data Controller or its processors, personal data may be stored for a maximum period of 5 (five) years or, until a user deletes a social media account.</p> <p>The EESC will store aggregated and numeric values of performance measurement in order to be able to compare its performance over a maximum period of 10 years.</p>
General description of security measures, where possible	<p>In order to protect personal data necessary for the purpose of the processing operation in question, the EESC has put in place a number of technical and organisational measures. 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. Encryption is performed by general-purpose hardware, with specialised cryptographic hardware holding and protecting cryptographic keys.</p>

	<p>Inside the EESC, the data can be accessed by designated EESC staff with a user ID and password. Organisational measures include restricting access to personal data solely to authorised personnel with a legitimate need to know for the purposes of this processing operation. Such staff abide by statutory, and when required, additional confidentiality agreements. Furthermore, all EESC processors are bound by a specific contractual clause for any processing operations of personal data on behalf of the EESC, and by the confidentiality obligations deriving from Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).</p>
Data protection notice:	Data Protection Notice