

# EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF  
PROCESSING PERSONAL DATA RELATED TO

THE EVENT

**“THE 23<sup>rd</sup> EUROPEAN DIPLOMATIC PROGRAMME”**

**2022-2023**

**ORGANISED BY THE EEAS**

## 1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the External Action Service (EEAS) including the Delegations to the European Union. You have the right under EU law to be informed when your personal data is processed [collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with Regulation (EU) 2018/1725 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, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and the EU Delegations process your personal data and what rights you have as a data subject.

## 2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The purpose of the data processing is to ensure proper organisation and management of the event “The 23<sup>rd</sup> European Diplomatic Programme” by the EEAS.RM.HR.4, Career, Learning and Development.

You can find information on the legal basis in Point 7 of this Privacy Statement.

- The organisation of event “The 23<sup>rd</sup> European Diplomatic Programme” includes the management of contact and mailings lists for invitations, handling of participation requests and feedbacks, the preparation and distribution of preparatory materials, meeting reports, news items and publications to the participants.
- Publication and communication activity related to the event “The 23<sup>rd</sup> European Diplomatic Programme” for dissemination purposes includes the publication of information about the event on the EEAS Intranet and/or on the EEAS website and the facilitation of photos, web streaming, audio or video during the event.

**Your personal data will not be used for automated decision-making including profiling.**

Video and Tele-conferencing (VTC)

Webex or Zoom might be used during some modules. In this case CISCO-Webex and Zoom service providers may become data processors. The aim to use these tools is to guarantee a feasible technical solution to participate at meetings organised online. Further information on data that the IT tools (online platform providers) may process and details of the type of data they may obtain about you and your equipment, and what they use that data for as well as the Privacy Policy of these third party processors are available on their websites, as follows:

- [WEBEX – CISCO Privacy Data Sheet](#)
- [ZOOM Privacy](#)

**The event will not be recorded.**

## 3. DATA PROCESSED: What data do we process?

I. Personal data will be collected, used and kept only to the extent necessary for the purposes above. Data, including personal data, that may be processed, are the following:

Participants:

- Personal details: name, surname, including work position, division, e-mail address
- Contact data (e-mail, phone, address – as necessary)
- Nationality, passport or identity card number and its date of issue and expiry date may be collected, so that the data subjects may obtain access to the premises where the meeting/event is held
- Pictures
- Your contribution during the training session (recording of the session), if the you consent to the recording,

Speakers/Moderators:

- Data categories detailed above
- Material shared and contribution during the training session (presentation, handout, etc.)
- Data submitted by the trainers during registration for the VTC tool (name and other data (e.g. email address) as required by the tool (data are kept to the necessary minimum)

II. In addition, data are also collected from the website or during the event and processed for the purpose of informing the public, promoting EU public diplomacy in communications and publications:

- Photos, audio or video filming and web streaming of speakers, participants or organisers as well as feedbacks, surveys, reports and other information about the event.

Disclaimer:

The organisers waive responsibility of videos/photos taken, shared, published by participants or other individuals, including journalists and other members of the press not contracted by the EEAS/EU Delegations.

**4. DATA CONTROLLER: Who is entrusted with processing your data?**

The data controller determining the purpose and means of the processing is the European External Action Service.

**The EEAS Division RM.HR.4, Career, Learning and Development is responsible for managing the personal data processing under the supervision of the Head of Division from which you received the invitation to the event “The 23<sup>rd</sup> European Diplomatic Programme”.**

**5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?**

In general, access to your personal data is provided to the EEAS staff responsible for carrying out this data processing activity and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The recipients of your data may be:

- Designated organising staff of the EEAS
- Assigned staff of other EU institutions and other assigned organiser team members, if required
- Security and other partners, contractors, service providers on behalf of the organiser
- Participants, technical staff if relevant
- EEAS staff and other EEAS Intranet users (if data published on the EEAS intranet)
- General public (if data made public on the internet, the EEAS website or social media platforms)
- If an external (online) tool is used for registration or other related event management purposes, the service provider operating the tool and its processors will be also recipient(s) of your personal data.

Personal data is not intended to be transferred to a third country or an international organisation.

Data will not be communicated to third parties, except where necessary for the purposes outlined above and will not be used for direct marketing. Under certain conditions outlined in law, we may disclose your information to third parties, (such as the European Anti-Fraud Office, the Court of Auditors, or law enforcement authorities) if it is necessary and proportionate for lawful, specific purposes. Service providers abide by contractual clauses for the protection of your data and will process data on documented instructions and on behalf of the EEAS/EU Delegation in accordance with Article 29 of Regulation (EU) 2018/1725.

**Social Media**

The EEAS use social media to promote and inform about events and meetings through widely used and contemporary channels. In addition to the [EEAS Webpage](#) or [FPI webpage](#), videos may be uploaded to the [EEAS YouTube](#) channel and links from our website can appear on [Twitter](#), [Instagram](#), [Flickr](#) and [Facebook](#). The use of social media does not in any way imply endorsement of them or their privacy policies. We recommend that users read the [Twitter](#), [Flickr](#), [Facebook](#), [Instagram](#) and [YouTube](#) privacy policies which explain their data processing policy, use of data, users' rights and the way how users can protect their privacy when using these services.

**6. ACCESS, RECTIFICATION AND ERASURE OF DATA: What rights do you have?**

You have the right of access to your personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. For more detailed legal references, you can find information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. If you have consented to recording a session, you have the right to withdraw your consent to its use by notifying the data controller. In this case, the EEAS will make every effort to remove your contribution from the recording. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent. If you wish to exercise your rights or have questions concerning the processing of your personal data, you may address them to the Data Controller via the functional mailbox:

**To contact the data controller please use the functional mailbox of the event  
(the mail address you received the invitation from) –  
[EUROPEAN-DIPLOMATIC-PROGRAMME@eeas.europa.eu](mailto:EUROPEAN-DIPLOMATIC-PROGRAMME@eeas.europa.eu)**

**7. LEGAL BASIS: On what grounds we collect your data?**

Lawfulness of the data processing

The processing of personal data related to event “The 23<sup>rd</sup> European Diplomatic Programme.” organised by the EEAS is necessary for the performance of a task carried out in the public interest [Article 5(1)(a) of Regulation (EU) 2018/1725], as mandated by the Treaties, in particular by articles 5, 11, 20, 21-40, 42, 43 of the of the Treaty on European Union (TEU) and 2 (4) and (5), 205, 220-221, 326 – 334 of the Treaty on the Functioning of the European Union (TFEU).

The processing is also necessary for archiving purposes. Archiving shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Further reference:

Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS (2010/427/EU) (OJ L 201, 3/8/2010, p. 30) and Shared Vision, Common Action: A Stronger Europe - A Global Strategy for the European Union's Foreign and Security Policy of June 2016 and Council Conclusions of October 2016 where the Council of the European Union emphasises *"the need of joining up efforts in the field of public diplomacy including strategic communication, inside and outside the EU, to speak with one voice and ultimately promote its core values"*.

At the same time, data processing for EU communication activities and publications is based on your consent requested separately [Article 5(1)(d) of Regulation (EU) 2018/1725]. Your consent is required for:

- photos, video recordings and web streaming related to events/meetings which may be shared in EU communications (see details in paragraph *"Recording of events given via videoconference"* of point 2)
- the processing of your personal data relating to your dietary requirements and/or access requirements
- sharing the attendance list containing your name, affiliation and contact details among participants and with the host/presenter of the event

If you do not wish, you also have the option not to provide consent to any of the above or to give consent only to one or more data processing activities. You can withdraw your consent at any time.

#### **8. TIME LIMIT - DATA STORING: For what period and how we process your data?**

Our aim is to keep your personal data not longer than necessary for the purposes we collect them. After the event, your data are kept as long as follow-up actions to the event are required. Reports and other material containing personal data are archived according to e-Domec policy.

Personal data will be deleted five years after the last action in relation to the event. Personal data may, however, be part of a contact list shared internally among EEAS services for the purpose of promoting future EU activities and disseminating information. The privacy statement on public diplomacy initiatives is also available on the EEAS website. Financial data related to the event will be kept for a maximum period of 10 years after the end of the event or meeting for auditing purposes. Sensitive personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting or event, but no later than within 1 month after the end of the meeting or event. Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time including the publication on the EU Delegation webpage and EEAS Intranet or EEAS website with appropriate safeguards in place.

##### Security of data

The EEAS, the EU Delegation and FPI strive to ensure a high level of security for your personal data. Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password. Physical copies are stored in a secured manner. In case a service provider is contracted, as a processor, the collected data may be stored electronically by the external contractor, who has to guarantee data protection and confidentiality required by the Reg. (EU) 2018/1725. These measures also provide a high level of assurance for the confidentiality and integrity of the communication between you [your browser] and the EEAS/EU Delegation. Nevertheless, a residual risk always exists for communication over the internet, including email exchange. The EEAS relies on services provided by other EU institutions, primarily the European Commission, to support the security and performance of the EEAS website.

Security of the online platforms used for video-conferencing is assured by the service providers. The security policy of data processors, such as CISCO-Webex can be verified at the relevant websites.

- [WEBEX – CISCO Security and Privacy](#); [CISCO – WEBEX meeting Privacy Data Sheet](#); [CISCO Privacy Data Map](#)
- [ZOOM Privacy Policy](#)

As CISCO-Webex enhance their security and privacy features, the EEAS keeps under constant review the technical measures it takes to protect your personal data.

#### **9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?**

If you have enquiries you can also contact the EEAS Data Protection Officer at [data-protection@eeas.europa.eu](mailto:data-protection@eeas.europa.eu).

#### **10. RECOURSE**

You have, at any time, the right to have recourse to the European Data Protection Supervisor at [edps@edps.europa.eu](mailto:edps@edps.europa.eu).