



EUROPEAN COMMISSION
Executive Agency for Small and Medium-sized Enterprises (EASME)

RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on Article 31 of the Regulation (EU) No 2018/1725¹ on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data, each responsible EASME data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2019-24

Initial approval by Data Controller: *see date of Ares signature*

Previous Notification (if applicable): *n/a*

Update (s) (if applicable): *n/a*

NAME OF THE PROCESSING ACTIVITY

EASME corporate public website and social media

IDENTIFICATION OF THE DATA CONTROLLER

Head of Unit C2, Administration, Executive Agency for Small and Medium-sized Enterprises (EASME).

GROUND FOR THIS RECORD (*select relevant ground*)

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place (ex-post)
- Change/Amendment/ Update of an already existing previous record (or previous notification to DPO)

DESCRIPTION OF THE PROCESSING ACTIVITY

The Agency provides and maintains a public website and social media accounts for various purposes aimed both at the general public and specific audiences.

The *Agency's public website* offers various types of content ranging from general information, news, background information, official documents, to specialised services such as subscription to newsletters and inquiry form as well as links to social media. Statistics of visitors' are collected.

The Agency has accounts on *social media*, like YouTube, Twitter and LinkedIn, to present its work through widely used and contemporary channels.

¹ [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 (OJ L 295/39 of 21.11.2018).

1. INFORMATION ON THE PROCESSING ACTIVITY of the EASME corporate public website and social media

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**² on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The Data Controller is:

The Head of Unit C2, Administration at the Executive Agency for Small and Medium-sized Enterprises (EASME), Place Charles Rogier 16, B-1049 Brussels and can be contacted at: EASME-COMMUNICATION@ec.europa.eu.

1.2. The following entity(ies) is/are acting as Processor(s): DG DIGIT and its external service providers contracted for the provision of services linked to the technical and organizational support of the Commission IT infrastructure. All processors are bound by a specific contractual clause in the contract for any processing operations of personal data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation (EU) No 2016/679.

1.3. The legal basis for the processing based on **Article 5(1)** of Regulation (EU) No 2018/1725:

- (a) the processing is necessary for the **performance of a task carried out in the public interest** or in the exercise of official authority vested in the Union Institution or body³;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions or bodies (Recital (22) of Regulation (EU) No 2018/1725) ;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject;
- (c) the 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;
- (d) the data subject has given **consent** to the processing of his or her personal data for one or more specific purposes;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

1.4. The respective purpose(s) of this processing is:

Agency's public website: the Agency provides the following services via its public website: subscription to newsletter and inquiry form.

Cookies of website visitors: When browsing the Agency's website, small data files called cookies, may be placed on the visitor's device. Their purpose is to enable the site to store visitor preferences, make the websites operational and gather anonymous analytics data for a certain period of time. All European Commission websites, including the one of the Agency, implement a cookie consent mechanism, allowing the visitors to accept or refuse the cookies.

The website also provided links to social media accounts of the Agency.

Social media: the Agency uses social media, like YouTube, Twitter and LinkedIn, to present its work through widely used and contemporary channels. Each social media channel has their own policy on the way they process personal data when accessing their sites. This implies that visitors will be asked for explicit consent to accept the cookies.

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 (OJ L 295/39 of 21.11.2018).

³ EASME Act of Establishment: Commission Implementing Decision C(2013/771/EU) of 17 December 2013 establishing the 'Executive Agency for Small and Medium-sized Enterprises' and repealing Decisions 2004/20/EC and 2007/372/EC.

1.5. The categories of data subjects concerned by this processing are all visitors of the Agency's corporate public website, subscribers to newsletter, requestors.

1.6. The following personal data are collected:

Agency's public website: Official photos of events, multimedia items showing persons participating in official events, their images, voices, statements, opinions and similar.

Visitors: IP address or device ID of the device used to access the website,

Subscribers to the newsletters: email; only the list of currently chosen newsletters with the associated email address is collected. Each change of your subscription erases instantly previous data; this includes also cancelling subscriptions. It is possible to unsubscribe at any time by clicking on the 'unsubscribe' link available in the footer of each individual newsletter.

The Agency collects personal data only to the extent necessary to fulfil precise purpose(s) related to its tasks as an EU institution. The Agency does not reuse personal data for another purpose different to the ones stated above.

The above mentioned personal data are **mandatory** for the purpose(s) as outlined above.

Social media also collect personal data and users should read the respective privacy policies.

1.7. The relevant recipients to whom the personal data will or might be disclosed are the general public for images or audio-visual items published on the Agency's corporate website and its social media accounts.

Other personal data is only accessible by authorised persons in the Agency or the Commission and its contractors in charge of the creation, maintenance, management and archiving of the website. Under certain conditions outlined in law, the Agency may disclose personal information to third parties, such as the European Anti-Fraud Office, the Court of Auditors, European Anti-Fraud Office (OLAF) or law enforcement authorities, if it is necessary and proportionate for lawful, specific purposes.

1.8. Personal data will not be transferred to third countries or international organisations.

1.9. The processing of this personal data will not include automated decision-making (such as profiling).

1.10. The following specific technical and organisational security measures are in place: The Agency is subject to the decisions of the Commission Decision 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission as well as the Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on the security in the Commission, and the Commission Decision (EU, Euratom) 2015/444 of 13 March 2015 on the security rules for protecting EU classified information, its implementing rules and the corresponding security notices.

1.11. Your personal data received from the "inquiry form" via email will be deleted automatically after **12 months**. Other personal data will be deleted upon your request at any time.

1.12. Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights** :

- to access their personal data held by a controller;
- to request their personal data held by a controller to be corrected;
- to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **of recourse** at any time to the **EASME Data Protection Officer** at EASME-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.

Request from a data subject to exercise a right will be dealt within in **one month**.

Any queries concerning the processing of personal data have to be addressed to the Data Controller indicated above in 1.1. at EASME-COMMUNICATION@ec.europa.eu.
