



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** Management of subscriptions to receive the Better Internet for Kids Bulletin and notifications via Newsroom as part of the Better Internet for Kids project.

**Data Controller:** European Commission, Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet.

**Data Processor:** EUN partnership aisbl ("European Schoolnet"), Rue de Trèves, 61 (3<sup>rd</sup> floor), 1040 Brussels, Belgium.

**Record reference:** DPR-EC-03928

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## 1. Introduction

The European Commission is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to [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.

This privacy statement explains the reason for the processing of your personal data to manage your subscription to the **Better Internet for Kids (BIK) Bulletin and notifications** sent in the context of the BIK project. This processing operation is managed by EUN Partnership (hereinafter “European Schoolnet” or “the Data Processor/Contractor”) on behalf of the Directorate-General for Communications Networks, Content and Technology, Unit G3: Accessibility, Multilingualism and Safer Internet of the Commission (“the Data Controller”). It describes the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the Data Processor, the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to the processing operation “*Management of subscriptions to receive the BIK Bulletin and notifications via Newsroom as part of the Better Internet for Kids (BIK) project*”, undertaken by European Schoolnet on behalf of the Commission, Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet, is presented below.

## 2. Why and how do we process your personal data?

**Purpose of the processing operation:** The Data Controller and the Data Processor collect and further process your personal data, so that you can receive information that you have requested in the context of the Better Internet for Kids (BIK) project through newsletters (i.e. the quarterly BIK Bulletin) or our notifications.

An online subscription form is available on the Better Internet for Kids (BIK) Portal where people can subscribe on a voluntary basis to the BIK Bulletin. Please note that by subscribing to the BIK Bulletin, you also agree to receive notifications on BIK activities.

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

## 3. On what legal ground(s) do we process your personal data?

You have subscribed to receive information linked to the Better Internet for Kids (BIK) project.

We process your personal data, because you have given your consent, as per Article 5(1)(d) of Regulation (EU) 2018/1725, to the processing of your personal data for the purpose of receiving the requested information through our newsletters or notifications, mainly in the form of the BIK Bulletin and notifications on BIK campaigns.

You have expressed your consent either by ticking the appropriate box in the BIK Bulletin online subscription form, or your consent has been expressed to European Schoolnet by email.

#### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation, the Data Processor collects the following categories of personal data on behalf of the Data Controller:

- First name
- Last name
- your e-mail address

These personal data are needed to ensure the delivery of the service to you as a subscriber.

#### **5. How long do we keep your personal data?**

The Data Processor and the Data Controller only keep your personal data for a period of 5 years after your last interaction with the Commission Services or until you request the deletion of your personal data.

If you have created a profile to benefit from the services of the Connect Newsroom, you may edit the personal data associated at any time. You can also delete your profile and the personal data associated to your profile.

You can also write to the dedicated mailbox [bulletin@betterinternetforkids.eu](mailto:bulletin@betterinternetforkids.eu) and ask to be unsubscribed from the mailing list or follow the unsubscribe link in the information email you have received.

#### **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission or on European Schoolnet servers on behalf of the European Commission. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, 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. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Commission's processors/contractors, including European Schoolnet, are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. European Schoolnet has put in place appropriate technical and organisational measures to ensure the level of security required by the Commission.

## **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff involved in this processing operation and to other authorised Commission staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

European Schoolnet staff also has access to your personal data according to the “need to know” principle.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

### **Third-party IT tools – social media**

European Schoolnet uses third-party IT tools to communicate about and promote campaigns through widely used communication channels, including various European Schoolnet social media accounts (e.g. Twitter, Facebook, LinkedIn, YouTube).

We may provide a link in newsletters and notifications, allowing you to watch videos or content uploaded to one of European Schoolnet’s social media pages or follow links to other relevant social media or websites.

Should you click to view such third-party content, those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission and European Schoolnet have no control would apply. We recommend that users carefully read the relevant privacy policies of the social media tools and websites used. These explain each company’s policy of personal data collection and further processing, their use of data, users’ rights and the ways in which users can protect their privacy when using those services. The use of a third-party IT tool does not in any way imply that the European Commission or European Schoolnet endorses them or their privacy policies. In the event that one or more third-party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

## **8. What are your rights and how can you exercise them?**

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have consented to provide your personal data to the Data Processor and Data Controller for the present processing operation. You can withdraw your consent at any time by notifying the the Data Controller Unit G.3 (and the Data Processor European Schoolnet) by using the contact details in Section 9 below. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Section 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Section 10 below) in your request.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within 1 month of receipt of the request. That period may be extended by 2 further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

## **9. Contact information**

### **- The Data Processor**

For any questions or concerns about this privacy statement or the processing of your data in the context of your subscription to the BIK Bulletin and notifications, you can contact the Data Processor: EUN Partnership aisbl (European Schoolnet) at [privacy@eun.org](mailto:privacy@eun.org).

Your questions will be transferred to the Data Controller (Unit G.3) if necessary. You may also contact the Data Controller directly.

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, namely the European Commission's Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet: [CNECT-G3@ec.europa.eu](mailto:CNECT-G3@ec.europa.eu).

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer [data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

<b>10. Where to find more detailed information?</b>
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The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the European Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-03928**.