



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

**This privacy statement provides information about
the processing and the protection of your personal data.**

Processing operation: Processing of personal data for *#NotOnOurFeed – Together against cyberbullying* campaign in the context of the Better Internet for Kids (BIK) project.

Joint Controllers:

- European Commission, Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G.3: Accessibility, Multilingualism and Safer Internet (“Unit G.3”)
- Meta (Merrion Road, Dublin 4, D04 X2K5, Ireland)
- LinkedIn (70 Sir John Rogerson's Quay, Dublin 2, Dublin, IE-D, D02 R296, Ireland)

Data Processor:

- EUN partnership asbl (“European Schoolnet”), Rue de Trèves, 61 (3rd floor), 1040 Brussels, Belgium.

Sub-processor:

- SocialHub, **maloon GmbH**, Schütterlettenweg 4, 85053 Ingolstadt, Germany

Record reference: DPR-EC-33088

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1. Introduction

The European Commission (hereafter ‘the 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, 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 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 of your personal data for the #NotOnOurFeed Campaign in the context of the Better Internet for Kids (project) managed by CNECT G.3 is presented below.

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

European Schoolnet on behalf of Unit G.3 processes your personal data to run this campaign.

In line with the EU Action plan against cyberbullying, the campaign aims to raise awareness, promote safer online behaviour, and strengthen prevention, reporting and support mechanisms.

Your personal data is not used for automated decision-making (as per Article 22 of Regulation (EU) 2018/1725).

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

CNECT G.3 processes your personal data because it 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 body (Article 5(1)(a) of Regulation (EU) 2018/1725).

The underlying Union law are Article 11 and Article 13 of the Treaty on European Union as well as Article 15 of the Treaty on the Functioning of the European Union. In addition, managing communication campaigns is a task resulting from the Commission's own prerogatives at institutional level, as provided for in Article 58 (2) (d) of Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union.

In addition, CNECT G.3 is subject to the Commission Implementing Decision amending Implementing Decision C(2025)1839 on the financing of the Digital Europe Programme and the adoption of the work programme for 2025-2027, which states that the Commission has to support the BIK platform, including for “awareness raising services on child online safety”, which includes “broad outreach to stakeholders by organising EU-wide campaigns”.

The campaign, in line with the three pillars of the EU Action plan against cyberbullying, aims to raise awareness of cyberbullying, promote safer and more responsible online behaviour, and increase awareness of the EU's tools, resources and support services to help prevent, report and respond to cyberbullying.

Regarding the processing of personal data by **Meta and LinkedIn**, see their documentation on targeted advertisement: [Meta](#) and [LinkedIn](#).

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

The following categories of personal data are processed and/or analysed for performance reporting:

a. Parameters chosen by European Schoolnet on LinkedIn and Meta:

- Location: EU 27
- Age: 18-65+
- Gender: all
- Languages: English

Job titles (LinkedIn)

- Youth workers
- Teachers (Primary, Secondary, Special Education)
- School administrators, principals
- University lecturers, professors in education / social sciences / media studies
- Parents' association leaders
- Child protection officers, social workers

Interests and traits (Meta + LinkedIn)

Cluster A – Parenting, education, child welling

- Parenting teenagers
- Parent-teacher associations
- Family and child development
- Schools, learning resources
- Teacher training
- Child wellbeing and safeguarding

Cluster B - Online safety and digital literacy

- Child online safety
- Cyberbullying prevention
- Online harassment and harmful online behavior
- Internet safety
- Digital wellbeing
- Media literacy
- Information literacy
- Responsible online behaviour

Cluster C – Tech, gaming, emerging online risks

- Gaming (console + online)
- Human-computer interaction
- Responsible tech
- Artificial intelligence
- Digital communication, Educational technology

Cluster D – Polic, regulation, digital rights

- EU policy
- Online safety regulation
- Privacy and data protection
- Internet law
- Public policy

Fields of Study (LinkedIn only)

- Education and child development (Educational tech, Instructional design, psychology, child development, social work)
- Media, communication and digital studies (Digital media, Media studies, Journalism, Sociology, Anthropology, Information science)
- Policy, law and tech (Public policy, EU affairs, Law: privacy/internet/data protection, Cybersecurity, AI, Information science)

Member skills (LinkedIn only)

- Education and child development skills: teaching, curriculum development, child psychology, educational leadership, social work
- Digital literacy and online safety skills: media literacy, information literacy, digital literacy, cybersecurity, risk management
- Policy and advocacy skills: policy analysis, eu affairs, research, advocacy, public awareness campaigns

Job functions (LinkedIn only)

- Education and research: teaching, training, academia, research, educational technology
- Policy and public sector: government, policy-making, ngos, public administration, program/project management
- Child protection and social work: social work, counseling, child protection, psychology
- Media and communication: journalism, media, public relations, communication
- Technology and safety: it, cybersecurity, responsible tech

- b. **Aggregated data** provided by LinkedIn to inform European Schoolnet on behalf of CNECT G.3 about performance results:

- Location
- Country/region
- Job function
- Job title
- Company
- Company industry
- Job seniority
- Company size
- Clicks
- Impressions
- Reach and sentiment
- Video views
- Video plays
- Cost per result
- Cost per thousand impressions (CPM)
- Cost per click (CPC)

- Click through rate (CTR)
- Cost per view (CPV)
- Frequency
- Link clicks
- Engagement
- Engagement rate
- Comments sentiment
- Post sentiment

For further information regarding the processing of personal data by **Meta and LinkedIn**, see their documentation on targeted advertisement: [Meta](#) and [LinkedIn](#).

5. How long do we keep your personal data?

In principle, CNECT G.3 does not store any personal data derived from user profiles and related personal data available through the users' networks and connections.

The retention period of personal data by **Meta and LinkedIn** are indicated in their privacy policy.

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 either on the servers of the Commission, or the advertising platforms (Meta and LinkedIn). On servers of the Commission, all processing operations carried out by the Commission are done 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.

As the Commission's contractor European Schoolnet is bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures in place. 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.

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

Access to all your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to your personal data is also provided to the processor staff according to the

“need to know” principle.

In the context of paid campaigns, European Schoolnet, on behalf of CNECT G.3, only get access to the aggregated data for the purpose of demographic and performance results: 1) Data derived from the user profiles on social media platforms (location, country, region, languages, interests, age, gender and other characteristics such as education, workplace, occupation, employment history;) and 2) Data available about users of social media platforms through their networks and connections: impressions, engagement, reach and sentiment, clicks, comments, shares of users on a specific topic, networks and connections.

SocialHub, a social media management tool is used for scheduling social media posts across multiple social media accounts to share campaign messages. European Schoolnet has signed a Data Protection Agreement that ensures full compliance with the Data Protection clauses of the service contract.

The joint controller has access to the personal data as described in their privacy policy: [Meta](#) and [LinkedIn](#).

International transfers:

- Article 47 of Regulation EU 2018/1725 (transfers on the basis of an adequacy decision) for personal data transferred to third countries which ensure an adequate level of protection and to social media platform providers which have self-certified under the EU-US Data Privacy Framework;
- Article 50(1)(d) of Regulation EU 2018/1725 (the transfer is necessary for important reasons of public interest) for transfers of personal data to social media providers which have not self-certified under the EU-US Data Privacy Framework, or to social media providers located in countries not covered by an adequacy decision.

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

You have specific rights as a ‘data subject’ under Chapter III of Regulation (EU) 2018/1725 and Regulation (EU) 2016/679 (GDPR), 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 the **right to object to the processing of your personal data** which is lawfully carried out pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

For those processing activities to which you have consented, you have the right to withdraw your consent at any time by notifying CNECT G.3.

The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the joint controllers, or in case of conflict the Data Protection Officers. If necessary, you can also address the European Data Protection Supervisor or the Data Protection Authority relevant for the social media platform used.

Where you contact the Commission 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 Heading 10 below) in your request.

9. Contact information

- The Data Processor/Contractor

For any questions or concerns about this privacy statement or the processing of your data, you can contact the Data Processor: EUN Partnership aisbl (European Schoolnet) at privacy@eun.org.

Your questions will be transferred to Unit G.3 if necessary. You may also contact Unit G.3 directly.

- The Commission

If you would like to exercise your rights under Regulation (EU) 2018/1725, or 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 CNECT.G.3 (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) 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) 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 Commission.

- Meta

If you would like to exercise your rights under Regulation (EU) 2016/679, or 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 **Meta** or their Data Protection Officer. Contact information available [here](#).

- LinkedIn

If you would like to exercise your rights under Regulation (EU) 2016/679, or 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 **LinkedIn** or their Data Protection Officer. Contact information available [here](#).

10. Where to find more detailed information regarding processing by the Commission?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the 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-33088.