



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 the use of social media in the context of the Better Internet for Kids (BIK) project.

Data Controller: European Commission, Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet ("CNECT G.3").

Data Processor: EUN partnership aisbl ("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 processing operation “Social Media Presence in the context of the Better Internet for Kids (BIK) project undertaken by European Schoolnet, on behalf of CNECT G.3” is presented below.

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

For the purpose of providing information to the general public, CNECT G.3 is present on the following social media platforms:

Instance X (formerly Twitter), Facebook, LinkedIn and YouTube.

The social media presence processing entails two main specific activities:

1. **Publishing content:** this involves the provision of information, including pictures and videos, to the public about its activities and works, about the EU policies and projects and to raise awareness about the Commission initiatives. In order to do so, European Schoolnet uses a third-party tool called SocialHub, but this does not entail the processing of any personal data.
2. **Community management:** as a follow-up activity to publishing content, CNECT G.3 may reply to citizens’ comments and questions under public posts (please see also purpose number 1 i.e. publishing content as all discussions would take place under the posts) as per standard communication practices. There is no additional processing taking place in the context of community management other than the direct engagement with the citizens. In order to do so, European Schoolnet uses a third-party tool called SocialHub. This tool automatically retrieves all comments, questions and messages from the Commission’s social media platforms linked to the BIK project in order to consolidate them in SocialHub, allowing European Schoolnet to reply directly from SocialHub too. SocialHub’s processing activities is limited to retrieving comments and questions, and allowing replies to be posted, but it does not further process such comments or questions. SocialHub processes personal data from imported interactions of potential social media users via interfaces to SocialHub’s servers and stores such data there. European Schoolnet manages this data completely itself via the software.

Using above-mentioned social media platforms is only one way of communicating to the public. The Commission websites remain the main platform to provide information about its activities and policies. As such, citizens do not need to access these social media platforms in order to be informed about the Commission's activities.

Before accessing the above-mentioned social media platforms, users are asked to accept or decline their respective policies. Social media users who want to interact with the Commission (for example by commenting on its posts) do so after having agreed to the policies of those platforms.

To learn more on how these social media platforms process your data, you are encouraged to read the respective privacy policies of the social media platforms.

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

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

The processing operations on personal data are carried out under **Article 5(1)(a) of Regulation (EU) 2018/1725**:

*"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 body."*

The social media presence of CNECT G.3 is necessary for the performance of a task carried out in the public interest laid down in the Union law below:

- *"The institutions shall, by appropriate means, give citizens and representative associations the opportunity to make known and publicly exchange their views in all areas of Union action", under Article 11(1) TEU;*
- *"The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society", as per Article 11(2) TEU;*
- *"The European Commission shall carry out broad consultations with parties concerned in order to ensure that the Union's actions are coherent and transparent", under Article 11(3) TEU;*
- *"In order to promote good governance and ensure the participation of civil society, the Union's institutions, bodies, offices and agencies shall conduct their work as openly as possible", as per Article 15(1) TFEU;*
- The freedom of expression and information under Article 11(1) of the Charter of Fundamental Rights of the European Union;
- Social media presence is a public service task also resulting from the Commission's own prerogatives at institutional level, as provided for in Article 58(2)(d) of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union;
- 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 organizing [...] campaigns*”.

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

Depending on the circumstances and on the social media platform in question, European Schoolnet on behalf of CNECT G.3 may have access to the following categories of data:

1. When publishing content that includes personal data

When publishing any type of content, the potential data subjects that can appear are:

- public figures (internal and external to the Commission) who, by the nature of their role and duties are exposed to the public eye;
- other data subjects (occasionally);
- other data subjects may occasionally appear on panoramic photographs or audiovisual content which render individual persons unidentifiable. This would be the case if the photo or video is taken in the context of an event and in line with the corporate policy for meetings and events.

2. In the context of community management

- publicly available personal data when engaging directly with social media users, such as: name and surname, username, geographical area, age, gender and other personal characteristics, such as marital status, nationality, occupation or academic record. The exact data that are available depends on what each user decides to share publicly. In this context, SocialHub processes the following types of personal data: full name, username of the social media profile interacting with European Schoolnet.
- content published by social media users, especially opinions and other contributions (i.e. comments, questions raised) submitted under public posts on the social media platforms. In this context, SocialHub processes the following types of personal data: communication content includes everything a user writes in a post/comment/direct message, including but not limited to message, image, video, attachments.

However, for statistical, analytical and monitoring purposes, CNECT G.3 only uses aggregated data, such as numbers of followers, numbers of interaction (likes, comments, shares). SocialHub is used to provide analytics reports relying entirely on aggregated data and does not store or process raw data including personal data of individual social media users for this purpose.

5. How long do we keep your personal data?

In the context of content and community management European Schoolnet on behalf of CNECT G.3 does not collect or retain personal data beyond what is strictly necessary.

For the purpose of managing community interactions and responding directly to users, European Schoolnet on behalf of CNECT G.3 via third party tool SocialHub stores the user’s name and publicly available communication content, for **a maximum of 2 years**.

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

In order to protect personal data necessary for the purpose of the processing operation in question, the Commission 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.

All related operations abide by the Commission's Decision (EU, Euratom) 2017/46, of 10 January 2017, on the security of communication and information systems in the European Commission. Inside the Commission, the data can be accessed by designated Commission staff with a user ID and a 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 Commission processors and sub-processors are bound by a specific contractual clause for any processing operations of personal data on behalf of the Commission, and by the confidentiality obligations deriving from the 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).

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

- **For publishing content:** general public, social media platforms, European Schoolnet and SocialHub, a social media management tool, used for scheduling social media posts across multiple social media accounts to share messages.
- **For community management:** authorised staff involved in communication activities in social media (namely Commission communication staff and IntraMuros external providers in their professional capacity), general public, social media platforms as well as the European Schoolnet employees and SocialHub.

Due to the digital dimension of social media platforms, personal data processed on social media accounts are available to the general public through internet websites or web applications.

International transfers:

CNECT G.3 transfers personal data to the following recipients in a third country in accordance with Regulation (EU) 2018/1725:

- CNECT G.3 relies on 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;

- 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, CNECT G.3 relies on the derogation listed in Article 50(1)(d) of Regulation EU 2018/1725 (the transfer is necessary for important reasons of public interest).

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. As regards this processing operation, you can exercise the following rights:

- Article 17 - Right of access by the data subject
- Article 18 - Right to rectification
- Article 19 - Right to erasure (right to be forgotten)
- Article 20 - Right to restriction of processing
- Article 21 - Notification obligation regarding rectification or erasure of personal data or restriction of processing
- Article 22 - Right to data portability
- Article 23 - Right to object
- Article 24 – Rights related to automated individual decision making, including profiling

For the purposes defined in this privacy statement, you can exercise your rights by contacting the CNECT G.3, 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 Heading 9 below.

For any other processing operations, you can exercise your rights by contacting the social media platform who process your data for their own purposes. You are encouraged to read the respective privacy policies of the social media platforms and reach out to the indicated contacts therein.

9. Contact information

- The Data Processor

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 CNECT G.3. You may also contact CNECT G.3 directly.

- The Data Controller

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 the Data Controller, CNECT G.3, at 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 Data Controller.

10. Where to find more detailed information?

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.