European Union
EXTERNAL ACTION

PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO

THE EU ALUMNI GLOBAL NETWORK'S WEBSITE AND DATABASE

EU ALUMNI

1. INTRODUCTION

The European External Action Service (hereafter "EEAS"), including the Delegations of the European Union ("EU Delegations"), is committed to protect your personal data and to respect your privacy. The EEAS collects and further processes personal data pursuant to 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.
You have the right under EU law to be informed when your personal data is processed [e.g. collected, used, stored], as well as about the purpose and details of that processing.
This privacy statement explains the reason for the processing of your personal data, the way the EEAS and EU Delegations collect, handle, uses and ensure protection of your personal data and what rights you have as a data subject. The information in relation to the EU Alumni Global Network (hereafter "the Network"), undertaken by the EEAS, is presented below.

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

The EU Alumni Global Network, managed by the European External Action Service (EEAS), connects former beneficiaries of EU-funded programmes and participants of EU initiatives that have an external dimension. The Network includes scholars, professionals, civil society representatives, activists, and young leaders from around the world. The Network helps maintain long-term relationships with the EU and its Delegations worldwide. It also facilitates knowledge-sharing and collaboration among alumni, as well as further engagement with the EU. Engagement can take the form of participation to panel discussions, trainings, advisory boards, and public events, contribution to EU campaigns and outreach activities, co-development of projects related to the EU policy across the globe.

Purpose of the data processing: Through the EU Alumni website, the EEAS collects and further processes your personal data so that you can be identified by EU staff, in headquarters and in EU delegations, or by managers of the EU programmes and initiatives with an external dimension (listed in the registration form), as individuals willing to further engage with the EU. EU staff can use your data to either contact you personally or send information, newsletters and invitations to a part of or to the whole network.

The data you provide in the registration form allows EU staff to contact you and to tailor engagement opportunities based on interests, profile and location. EU staff, in headquarters and in EU delegations, and managers of the EU programmes and initiatives listed in the registration form, can see your data and download it to contact you by email or by phone (optional) and send you invitations to events and activities conducted by EU Institutions and further contact opportunities with EU stakeholders. In addition, your data may be used to generate anonymised statistics about the EU Alumni Global Network.

While providing your data on the EU Alumni website, you can choose whether you also want to receive the EU Alumni Magazine, a monthly newsletter sent via EC Newsroom, and/or an invitation to join the Network's group on LinkedIn. EC Newsroom and LinkedIn act as separate data controllers. EC Newsroom's privacy and data protection policies apply to subscription to the EU Alumni Magazine, while LinkedIn's privacy and data protection policies apply to the LinkedIn group.

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

3. DATA PROCESSED: What data do we process?

In order to carry out this processing operation, the EEAS collects the data that provided in the registration form on the EU Alumni website:

Personal details

- Mandatory: your first name, last name, email address, country and city of residence,
- Optional: your phone number, nationality/ies, main function, date of birth, and gender

Connection to the EU

- The programme(s) or project(s) that connect you to the EU
- The EU delegation(s) you want to be connected with, if different from the country of residence
- Sectors of interest, (EU) policy areas you are interested in (optional)

Additional information

- Any information you may add to specify your profile and connection to the EU (optional)

Data gathered through your participation in an event or activity following an invitation via the EU Alumni Global Network, including submissions to the EU Alumni Magazine, are processed independently and governed by distinct privacy notices.

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 (EEAS).
The EEAS division entrusted with managing the processing, under the supervision of the Head of Division, is:
EEAS.GII.GLOBAL.STRAT.2, **Global Communications Policy and Public Diplomacy.**

The EU delegations, and the EU institutions, bodies, offices, and agencies involved in the EU Alumni Global Network are entrusted with processing your data during the activity, event and project, which they invite you to take part in.

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

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

Where necessary, we may also share your information with service providers, contracted by the EU, for the purposes of managing specific alumni networks linked to EU programmes or projects, and organising specific activities.
If necessary, the data controller will transfer your personal data to its processors (contractors) in third countries in accordance with Regulation (EU) 2018/1725.
Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725, public authorities (e.g. European Anti-Fraud Office, 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.

Data will not be shared with any third parties for direct marketing. Data will not be communicated to third parties, except where necessary for the purposes outlined above.

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

As 'data subject' under Section III of Regulation (EU) 2018/1725, you have the right to access your personal data and to rectify or complete any inaccurate or incomplete personal data. Where applicable, you have the right to the erasure of your personal data and, to restrict their use.
You have consented to provide your personal data to the data controller for the present processing activity. You can withdraw your consent at any time by notifying the data controller by sending an email to EU-ALUMNI@eeas.europa.eu. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent. Within a reasonable period technically necessary, the EEAS will erase your personal data except the data necessary for the establishment, exercise of defence of legal claims and for archiving purposes in the public interest.
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 mailboxes:
STRATEGIC-COMMUNICATIONS@eeas.europa.eu or
EU-ALUMNI@eeas.europa.eu

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

Lawfulness of the data processing
The processing of personal data collected through the EU ALUMNI website is based on your consent [Article 5(1)(d) of Regulation (EU) 2018/1725]. When you submit the registration form on the EU Alumni website, you provide consent to the processing of your personal data as described in point 2, including:

- the use by EU staff of your data to connect to you and to interact with you, including sending newsletters and event invitations,
- the generation of anonymised statistics.

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 references:
Treaty on European Union (Lisbon Treaty), Article 2, Official Journal of the EU C 83/17, 30 March 2010
Article 1 (Nature and Scope), 2 (Tasks) and 3 (Cooperation) of the 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)

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 emphasising *"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*".

The European Union's objectives in its external relations are defined in Article 3(5) of the Lisbon Treaty as follows: "*In its relations with the wider world, the Union shall uphold and promote its values and interests and contribute to the protection of its citizens. It shall contribute to peace, security, the sustainable development of the Earth, solidarity and mutual respect among peoples, free and fair trade, eradication of poverty and the protection of human rights, in particular the rights of the child, as well as to the strict observance and the development of international law, including respect for the principles of the United Nations Charter*".

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

Data retention period: The data controller retains your personal data only for as long as necessary to fulfil the original purpose of collection or any further processing.
Given that the EU Alumni Global Network is designed to sustain long-term connections and engagement, your data will be stored for as long as you maintain your consent. Should you wish to have your data erased from the database, you may withdraw your consent at any time by emailing the data processor at EU-ALUMNI@eeas.europa.eu.

Consent renewal: Members of the Network will be asked to renew their consent if, or whenever, there is a significant change to the Network's purpose, scope, or data collection methods. In case they do not react or renew their consent, their data will be deleted from the database.

Offline data handling: Any personal data downloaded or printed by EU staff or service providers for the purpose of organising or managing specific activities or events will be securely deleted within five years of the conclusion of the activity or event.

Security of data: The EEAS, the EU Delegations, as all EU institutions, bodies, offices and agencies strive to ensure a high level of security for your personal data.
All personal data in electronic format (e.g. data collected through the EU Alumni website) are stored on a managed cloud instance of the European Commission (DG DIGIT). Access to the database by EU staff is protected by EU Login. EU Alumni contacts can access and update their own information using a secure, single-use authentication link sent to their registered email address and valid for a limited period. All processing operations are carried out pursuant to Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission (EC), also applied by the EEAS. Physical copies of personal data are stored in a properly secured manner.

In order to protect your personal data, the EEAS and the European Commission have 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 personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The EEAS's and the European Commission's contractors (processors) are bound by a specific contractual clause for any processing operation of personal data on behalf of the EEAS and the European Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation ("the GDPR", Regulation (EU) 2016/679) applicable in the EU Member States. The processors must put in place appropriate technical and organizational measures to ensure the level of security required by the EEAS and the European Commission.

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.

10. RECOURSE

You have, at any time, the right to have recourse to the European Data Protection Supervisor at edps@edps.europa.eu.