

# PRIVACY STATEMENT - DATA PROTECTION NOTICE

## FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO THE EU ALUMNI ONLINE COMMUNITY



### 1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European Commission and the European External Action Service (EEAS), including the Delegations of the European Union. 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.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with 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, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject.

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

In the framework of the development of a more "joined-up Public Diplomacy" noted in the EU Global Strategy, the EU Alumni Engagement Initiative (hereafter "EU ALUMNI" or "EU ALUMNI Initiative") aims at reinforcing the capacity of the European Union to sustain a long-term meaningful engagement with individuals, in particular, in third countries who have benefited from EU-funded programmes and initiatives. For this purpose, EU ALUMNI supports EU Delegations along with EU institutions, bodies, offices and agencies to engage with the alumni and current participants of EU programmes by organising activities and events and by operating an Alumni Platform consisting of two components: (1) an online network (EU ALUMNI Online Community, hereafter Online Community) and (2) a database to manage relationship with Community members (EU Internal Alumni Relations Database) for EU staff. The EU ALUMNI Initiative is funded under the Regulation (EU) No 234/2014 of the European Parliament and the Council of the EU of 11/03/2014 establishing a Partnership Instrument for cooperation with third countries.

The Online Community is dedicated to foster connections between EU Alumni and EU representatives as well as to facilitate networking among EU Alumni. The EU is interested in connecting and engaging with EU Alumni and participants of EU programmes and initiatives to build new partnerships in a profound and sustainable way related to public diplomacy activities and other projects. Registration to the platform is voluntary. The data that you and other EU Alumni provide in their profiles in the Online Community will be also available in an EU Internal Alumni Relations Database, which allows the EU representatives to identify EU Alumni for further collaboration and engagement in the future.

#### Objectives of the Online Community:

##### Facilitate online networking

The EU collects and uses your personal information to grant you access to the Online Community and its services and to ensure its functioning and management. In particular, processing of personal data is necessary to allow you becoming part of the Online Community, access functionalities, connect with other alumni and receive email alerts for notifications. In order to foster networking within the Online Community, the platform offers several features such as user profiles with "follow" functionality, a personal news feed where you can post content and comments for other users and vice versa, and a messenger/chat for individual or group exchange with other members. Furthermore, you have your own profile page as a member, where you can provide personal details, contact information, academic and professional background, interests, etc. to other members.

You register in the Online Community on a voluntary basis (with the right of withdrawing your registration and participation at any moment). To complete registration on the platform, you provide a set of mandatory information (the details of which are listed in section 3 of this Privacy Statement). You can indicate additional information optionally during and after the registration process. Most data are visible for other members of the Online Community. You can modify these data at any time.

A Community Board is also organised. Abuse or non-compliance with the Community Guidelines can be reported to the Board, which decides on the action to be taken.

##### Alumni relationship building

The information you provide in the Online Community (personal/user data) will also be transferred to the EU Internal Alumni Relations Database, which is only accessible to designated EU officials assigned for specific communication and public diplomacy tasks. This alumni relations database allows them to connect with EU Alumni via email for cooperation and engagement in the future by enabling access, search and managing information provided by members of the Online Community. It also allows EU officials to tailor engagement opportunities based on interests, needs and location more efficiently and to organise follow-up actions. The data can be downloaded to invite you to further events and activities conducted by EU Institutions or to send you information mails.

## Organisation of events

The organisation of events includes the management of mailing lists for invitations, handling of participation requests and feedback, the distribution of preparatory materials, meeting reports, news items and publications to the participants before and, where required, after the event. The organisers of events can use the event registration function of the Online Community to collect registrations for events from its members.

During registration for an event, you can give your consent to different uses of your data, as follows:

Individual photographs of participants or group pictures taken and published as part of public relations work or on the website of the EU ALUMNI Initiative or other EU websites and social media, in particular as part of publication and communication activities related to the event for dissemination purposes on the website of the EU ALUMNI Initiative (<https://alumni.europa.eu/>) and within the Online Community, the EEAS Intranet and/or on the EEAS and FPI websites and other EU websites relevant to the project, as well as social media channels of the EU. Appropriate alternatives will be offered to participants who do not wish to appear in the published materials mentioned above.

Events may as well be recorded; if possible the recording can be limited to the speaker/presenter/moderator only; this option will be chosen in case not all participants agree to the recording. In cases where an event is recorded, this is to be indicated in the invitation, or in any other way during the registration process. Information will be provided as to how and when consent to the recording can be given. Alternatives will be offered, if possible, for those participants who do not wish to be recorded.

You can find the privacy statement describing how the EEAS processes your data when you participate in an event here: [https://www.eeas.europa.eu/eeas/eeas-privacy-statement-events-meetings-etc-tools\\_en](https://www.eeas.europa.eu/eeas/eeas-privacy-statement-events-meetings-etc-tools_en). Specific privacy statements describe the processing of personal data of participants for specific events, the link to these privacy statements appear on the registration page and can be also consulted on the EEAS website: [https://www.eeas.europa.eu/eeas/privacy-statements-data-protection-notice\\_en](https://www.eeas.europa.eu/eeas/privacy-statements-data-protection-notice_en).

## Production and dissemination of information material (editorial work)

To provide you with targeted information on important developments, activities, events, initiatives or thematic issues in the area of EU Foreign Policy and other EU policy fields, the EU ALUMNI Initiative offers newsletters, articles, reports, interviews, and other written information as well as visual content to the members of the Online Community.

This Privacy Statement also covers the processing of data in the context of "editorial work", i.e. production and dissemination, including publication of audio-visual or written interviews. Photos together with the interview/article will be published and promoted on the EU ALUMNI website and newsletter, other EU websites relevant to the project, as well as social media channels of the EU (e.g. Facebook, Twitter, LinkedIn, Instagram, etc.) or transformed in different EU-public relations products (e.g., articles, videos etc.). This always requires your explicit consent.

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

## **3. DATA PROCESSED: What data do we process?**

I. Personal data will be collected, handled and kept only to the extent necessary for the purposes above. Data, including personal data, that may be processed, are the following:

- Personal details
  - Profiles for EU Alumni (mandatory):
    - First name, last name, city and country of residence, nationality, occupation;
    - Gender, date of birth (visible only to the Administrators, the Community Board and EU Alumni managers).
  - Profiles for organisation representatives (mandatory):
    - Name and type of organisation, first name, last name, nationality, city and country of residence;
    - Gender, date of birth (visible only to the Administrators, the Community Board and EU Alumni managers).
- For gender, there are the following options to choose from: "Female"; "Male"; "None of the above" and "I'd rather not say". This information (regardless of the option chosen) is not visible in the profiles for other members of the Online Community.
- Account and contact data:
  - E-mail address (mandatory; only visible to the Administrators, members of the Community Board and EU Alumni managers);
  - Password (mandatory; stored in an encrypted form and only accessible for the users themselves);
  - Phone number, social media channels (optional). -
- Information on the EU programme/funding organisation
  - Profiles for EU Alumni:
    - Type of the EU programme/initiative participated (mandatory);
    - Host country, programme duration, scholarship ID, membership in alumni organisation (optional).
  - Profiles for organisations:
    - Existing since, "our mission", countries of activity (mandatory);
    - Short description, number of participants/members, other information you provide about the organisation, (optional).
- Academic and professional background (all optional): Educational degree, field of study, university/institution/college, subject of study, current and former occupations (job title, position, start date, industry/sector, company)
- Skills, interests and additional information:
  - Interests in EU policy areas (mandatory);
  - Skills and expertise, languages with skill level, voluntary engagement, "About me", awards (optional).
- Activity in the Online Community:
  - Log-in/log-off time stamp and statistical data (only Administrators, Community Board and EU Alumni managers have permission to access these data);

- Event registrations (only if you give your consent);
- User generated content shared with other members in the feed (e.g. images, texts, videos), number of followers;
- Private messages (other than the recipients of the message, only Administrators, the Community Board and EU Alumni managers have permission to access these, solely to provide troubleshooting or when the Community Guidelines are violated or in case of illegal, fraudulent or commercial activity).
- Profile pictures (optional)
- Additional information about specific alumni added by EU Alumni managers (e.g. mark as VIPs, recommendation as speakers); also visible for the Administrators and the Community Board.

II. In addition, data are also collected for the website or during the organisation and facilitation of events:

- Biographical information, photos or video filming as part of news articles (e.g. interviews; after explicit consent);
- Photos, audio or video filming and web streaming of speakers, participants or organisers as well as feedbacks, surveys, reports and other information about the event (after explicit consent).

Disclaimer: The organisers waive responsibility of videos/photos taken, shared, published by participants or other individuals, including journalists and other members of the press not contracted by the EU.

#### 4. DATA CONTROLLER: Who is entrusted with processing your data?

The data controllers determining the purpose and means of the processing are the **European Commission, Service for Foreign Policy Instruments (FPI)**, FPI.4 Unit, Industrialised Countries and Foreign Policy Support and the **European External Action Service (EEAS)**, Strategic Communication and Foresight, SG STRAT, Communications Policy and Public Diplomacy, SG. STRAT.1. The FPI is responsible for setting up the project and the EEAS is to be in charge of facilitating the activities related to the EU ALUMNI Online Community (planned date: December 2022).

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

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

Inside the Online Community, you and other members can view each others' general profile data (excluding information of private and confidential nature such as gender, age or e-mail address) and content (posts, event registrations, etc.), see point 3 for further information. Private chat messages are only visible to you and the other participant(s) of the respective chats. The EU Internal Alumni Relations Database is only accessible to a restricted group of designated EU officials, staff members of EU institutions and bodies through a secure interface and using "EU Login" authentication.

Different levels of access rights will be included so that only relevant data is visible to each user:

- Administrators are the operators of the platform. Administrators are responsible for a smooth operation of the system and the overall management of data (troubleshooting, data cleansing, deletions, etc.). They have access to the user and activity data strictly for performance (besides the password, which is encrypted and never visible). They also allocate permissions (user rights), e.g. to add users to the EU Internal Alumni Relations Database.
- Community Board: The Community Board manages the Online Community and the EU Internal Alumni Relations Database in order to offer all users and members the best possible user experience. In the Online Community, the Community Board engages with members (e.g. send newsletter, manage notifications/reminders) and has access to user data exclusively for the following reasons: tailoring content and actions to the members, organising online and offline activities (mainly events), monitoring, reporting and statistics (aggregated data). The Community Board is also responsible to support the EU Alumni managers in the operational use of the EU Internal Alumni Relations Database.
- EU Alumni managers are EU officials, who will use the EU Internal Alumni Relations Database to identify relevant alumni for their activities, store and manage their data and invite them to events (incl. event registration and preparation).

More specifically, the recipients of the data may be:

- Other members of the Online Community, including members from countries outside the European Economic Area, i.e. not bound by European data protection rules, can see your profile data and content in the EU ALUMNI Online Community only;
- Designated organising staff of FPI and the EEAS, including EU Delegations;
- European Commission assigned staff members designated for the tasks to be implemented and assigned staff of other EU institutions and other assigned organiser team members, if required;
- Under certain conditions outlined in law, we may disclose your information to third parties, such as staff of OLAF, IDOC and the Legal Service of the Commission as well as staff of other DGs (SG, DG BUDG and Clearing House) upon request necessary in the context of official investigations or for audit purposes;
- Security and other partners, contractors, service providers on behalf of the organizer;
- Technical staff of DG INTPA (DevOps) and DG DIGIT (Amazon Web Services);
- Designated employees of Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) as service provider and part of the administration team and the Community Board.

The system is processed and hosted under the form of Software as a Service (SaaS) and Platform as a Service (PaaS) on Amazon Web Services (AWS). Those services are contracted to Amazon Web Services EMEA SARL and managed by the European Commission and EEAS. The data is encrypted using "customer managed keys" of AWS.

Personal data is not intended to be transferred to a third country or an international organisation. Neither will the data be communicated to third parties, except where necessary for the purposes outlined above and will not be used for direct marketing. Service providers abide by contractual clauses for the protection of your data and will process data on documented instructions and on behalf of the EEAS/EU Delegation in accordance with Article 29 of Regulation (EU) 2018/1725.

The EEAS and the EU Delegations, including Regional Teams of the FPI, use social media to promote and inform about events and meetings through widely used and contemporary channels. In addition to the [EEAS Webpage](#) or [FPI webpage](#), videos may be uploaded to the [EEAS YouTube](#) channel and links from our website can appear on [Twitter](#), [Instagram](#), [Flickr](#) and [Facebook](#). The use of social media does not in any way imply endorsement of the privacy policies of the social media providers. We recommend that users read the [Twitter](#), [Flickr](#), [Facebook](#), [Instagram](#) and [YouTube](#) privacy policies which explain their data processing policy, use of data, users' rights and the way how users can protect their privacy when using these services.

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

You have the right of access to your personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. You have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. For more detailed legal references, you can find information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. If you have consented to recording a session, you have the right to withdraw your consent to its use by notifying the data controller. In this case, the FPI will make every effort to remove your contribution from the recording. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent. 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 mailbox:

**To contact the data controller, please use the functional mailbox [FPI-4@ec.europa.eu](mailto:FPI-4@ec.europa.eu) and [STRATEGIC-COMMUNICATIONS@eeas.europa.eu](mailto:STRATEGIC-COMMUNICATIONS@eeas.europa.eu) or [PUBLIC-DIPLOMACY@eeas.europa.eu](mailto:PUBLIC-DIPLOMACY@eeas.europa.eu).**

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

### Lawfulness of the data processing

**The processing of personal data with regard to the the EU ALUMNI Online Community and the EU Internal Alumni Relations Database of the EU ALUMNI Engagement Initiative is based on your consent [Article 5(1)(d) of Regulation (EU) 2018/1725]. When you register to the Online Community (<https://alumni.europa.eu/community>) you provide consent to the processing of your personal data as described in point 2, including:**

- the information sharing with other Online Community participants,
- the use by EU institutions of your data in the EU Internal Alumni Relations Database to connect to you and to interact with you, including sending newsletters and event invitations,
- the processing of data in the context of editorial work (*see details in paragraph "Production and dissemination of information material (editorial work)" of point 2*),
- the publication and dissemination of EU ALUMNI and other information material.

**As part of your activity in the Online Community, in particular during registration to events you can provide consent to further processing of your personal data related to the specific action or event (*see details in paragraph "Organisation of events" under point 2 and in the registration form of the events for which you register*), including**

- photos, video recordings and web streamings linked to events which may be shared in EU communications,
- sharing your name and contact information with other participants of the event and other members of the EU Alumni Online Community,
- include your data in contact or mailing lists for events as well as for newsletters related to EU actions and initiatives,
- sharing information about your participation with members of the Online Community,

If you do not wish, you also have the option not to provide consent to any of the above or to give consent only to one or more data processing activities. You can withdraw consent any time by contacting the data controller at the functional mailboxes under Point 6. You can delete your account in the ALUMNI Community and the EU Internal Alumni Relations Database. If you delete your account or withdraw consent, we will remove your data and content within a reasonable period.

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 European Union 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 where the Council of the European Union emphasises "*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?

Our aim is to keep your personal data not longer than necessary for the purposes we collect them.

As member of the EU ALUMNI Online Community, you will find further details on the storage periods of your data in the description below:

The **users' data in the Alumni Platform** is stored as long as the users are registered in the Online Community and have given the required consent. There is no need for further action for active members, as long as they sign in regularly (minimum once in three years) and the purpose for which the data was collected or otherwise processed does not change. Inactive members who have not logged onto the Online Community for three years must renew their consent and confirm that their data can continue to be stored. Several months before the three-year period expires, they are asked for a consent renewal. In case they do not react before the expiry of the three-year period, their data will be deleted from the system.

The users can also delete their accounts on a voluntary basis at any time. The request will be processed within maximum one month from the date of the request. During the deletion process the users can decide, whether they agree to leave their stored data in the EU Internal Alumni Relations Database. Those who do so will also be asked every three years via email to renew consent. In case they do not react before the expiry of the three-year period, their data will be deleted fully.

Personal **data added within the EU Internal Alumni Relations Database** by the Administrators, members of the Community Board and Alumni administrators will be stored as long as the data subjects are registered in the Online Community and have given the required consent or if they actively agreed to leave their data in the EU Internal Alumni Relations Database although they quitted their membership in the Online Community. The data will be treated in the same way as the other data in the Alumni Database. The consent will be renewed as described in the previous paragraph.

Personal data **downloaded or printed by** the EU Alumni managers in order to organise and manage specific **meetings or events** will be deleted five years after the meeting or event. The day following the meeting or event will mark the beginning of the retention period.

Personal data related to **conducting interviews** will be deleted two years after the implementation period of the EU Alumni Initiative ended. Cessation of all activities will mark the beginning of the retention period.

Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time including the publication on the EU Delegation webpage and EEAS Intranet or EEAS website with appropriate safeguards in place.

### Security of data

The EEAS, the EU Delegation and FPI strive to ensure a high level of security for your personal data. Appropriate organisational and technical measures are ensured according to Article 33 of Regulation (EU) 2018/1725.

All personal data in electronic format are stored on AWS. 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. The Commission's contractors (processors) are bound by a specific contractual clause for any processing operations of personal data on behalf of the European 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 personal data of the individuals, 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. Authentication of the EU Alumni platform is handled by EU Login. When a user wants to log in the EU Login module checks if they are already logged in via EU Login and if not, the user is being redirected to the EU Login site. The user's password is stored only on the EU Login system. EU Login is using Two Factor Authentication in case of connecting from outside the EC or EEAS network. The user's username, full name and e-mail are stored both on EU Login and the selected product. All other user data is stored on the selected product.

Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password. Physical copies are stored in a secured manner.

The measures also provide a high level of assurance for the confidentiality and integrity of the communication between you [your browser] and the EEAS/EU Delegation. Nevertheless, a residual risk always exists for communication over the internet, including email exchange. The EEAS relies on services provided by other EU institutions, primarily the European Commission, to support the security and performance of the alumni platform.

## 9. EEAS/FPI 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](mailto:data-protection@eeas.europa.eu). or for the FPI, the Data Protection Officer of the European Commission at [data-protection-officer@ec.europa.eu](mailto:data-protection-officer@ec.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](mailto:edps@edps.europa.eu).