



DATA PROTECTION NOTICE

Use of social media platforms

1. Introduction

The European Union Agency for Asylum (hereinafter ‘the EUAA’ or ‘the Agency’) is committed to protecting your privacy. The EUAA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#)¹ (hereinafter ‘the EUDPR’).

This Data Protection Notice explains *inter alia* the reasons for the processing of your personal data, the way we collect, handle and ensure protection of your personal data 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, as well as of the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS) to which you may have recourse as well, to exercise these rights.

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

Your personal data are processed for the following purposes:

Communication of the EUAA work and information provision activities:

The EUAA uses social media channels and platforms (namely Meta, LinkedIn, X, YouTube, and Telegram) to communicate a broad range of its activities to the public and to provide information. Audio-visual content used for communication purposes may contain personal data of the EUAA personnel, and/or personnel of national competent authorities. Other individuals, such as applicants for international protection, may also appear in visual content, however not in a way that makes them identifiable.

Measuring media and social media outreach:

The EUAA has contracted the services of Meltwater the Netherlands B.V. to follow the Agency’s outreach in traditional and online press markets, as well as on social media platforms. The social media component is handled by Hootsuite Inc. The Agency uses aggregated performance-related statistics (e.g. number of views, likes and shares) and is not making use of the information of individual end-users.

Promoted Content:

The Agency has contracted the services of Pomilio Blumm S.r.l. to perform paid advertising on various social media platforms, on its behalf. The Agency’s advertising choices are based on the content of the social media message in question, including the language in which it is written. As a result, paid advertising campaigns typically happen on the national level, e.g. content written in German, may be published in Member States where German is widely spoken.

¹. 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39-98.





It is noted that social media platforms are only one means of external communication. All information is also available on the Agency's website, which is the EUAA's main means of communication to the public. As such, the public does not need to access the Agency's social media platforms to be informed about its activities.

Social media platforms have dedicated privacy policies. End-users acknowledge having reviewed these policies both prior to, and as a condition of access, to those platforms.

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

We process your personal data to achieve the purposes as described in Article 2(2) of [Regulation \(EU\) 2021/2303](#)¹ (hereinafter 'the EUAA Regulation') that states that "*The Agency shall, on its own initiative, engage in communication activities in the fields within its mandate. It shall provide the public with accurate and comprehensive information about its activities. (...)*". The processing is lawful, under Article 5(1)(a) of the EUDPR. To the extent that processing of personal data is based on the consent obtained from data subjects, such processing is lawful also under point (d) of Article 5(1) of the EUDPR.

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

The following (categories of) personal data may be processed:

In the context of communicating the EUAA's work and providing information:

- Personal data relevant for audio-visual content such as voice recordings, video recordings, or images of data subject(s).

In the context of measuring the media and social media outreach:

- Personal data about users of social media platforms may refer to profile name, geographical area, age, gender, marital status, comments, shares on a specific topic, engagement with a specific topic, their networks/connections.

In the context of promoted content:

- Personal data about users of social media platforms may refer to geographical area.

5. How long do we keep your personal data?

The EUAA only stores aggregated numeric values of the outreach to be able to compare its performance over a maximum period of 10 years. Audio-visual material is stored *a priori* for a period of 5 years and some of it will be part of the historic archive of the EUAA.

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

In order to protect your personal data, we have put a number of technical and organisational measures in place as required under Article 33 of the EUDPR. More precisely:

- Audio-visual content, while under preparation, is accessible only by authorised personnel of the EUAA;



- When necessary, visual content may be subject to blurring to protect the identity of the individuals appearing there;
- All EUAA social media accounts are password protected, with 2-factor authentication also enabled;
- Only authorised personnel of the EUAA has access to social media accounts and their monitoring. Such personnel abide by statutory, and when required, additional confidentiality agreements.

7. Who has access to your personal data and to whom are they disclosed?

The following (categories of) recipients have access to your personal data:

- Authorised EUAA personnel responsible for drafting, approving and disseminating information on the Agency's activities through various social media channels;
- (Following publication) End-users of media and social media platforms.

8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

Online publication of audio-visual material that may contain personal data does not exclude the possibility that this material may be accessed from residents in third countries and therefore result in a transfer of personal data to third countries. In this respect it should be noted that the Agency holds the explicit consent of the data subject(s) prior to any publication taking place.

9. Does this processing involve automated decision-making, including profiling?

No

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

According to the EUDPR, you are entitled to access your personal data and to rectify them in case the data are inaccurate or incomplete. If your personal data are no longer needed by the EUAA or if the processing operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data are lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer it from one Data Controller to another. Where relevant and technically feasible, the EUAA will do this work for you.

If you wish to exercise your rights, please contact the Data Controller, i.e. Head of Communication and Public Relations Unit, by sending an e-mail to press@euaa.europa.eu.

You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of the EUAA using the following e-mail address: dpo@euaa.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: supervision@edps.europa.eu



Adopted: 30 July 2024