



Record on the use of social media platforms

Last update of the record	30/07/2024
Data controller(s)	<p>Head of Communication and Public Relations Unit European Union Agency for Asylum (EUAA) Triq L-Ghassara ta' L-Gheneb, MRS 1917 II-Marsa Malta</p> <p>The EU/EEA-based legal representatives of the following social media platforms are separate data controllers, in respect of whom data subjects may exercise their statutory rights, as provided for under Regulation (EU) 2016/679 (hereinafter, 'the GDPR'):</p> <ul style="list-style-type: none"> • Meta Platforms Ireland Ltd., subsidiary entity of Meta Platforms Inc., operating the social media platforms commonly known as "Facebook" and "Instagram"; • Twitter International ULC., subsidiary of X Corp., operating the social media platform commonly known as "X", formerly "Twitter"; • LinkedIn Ireland ULC., on behalf of Microsoft Corporation, operating the social media platform commonly known as "LinkedIn"; • Google Europe International Technology ULC., subsidiary entity of Google ULC., operating the social media platform commonly known as "YouTube" • European Data Protection Office on behalf of Telegram Messenger Inc. and operating the social media platform commonly known as "Telegram". <p>The aforementioned social media platforms have dedicated privacy policies, each of which has been referenced in this record. End-users acknowledge having reviewed these policies both prior to, and as a condition of access, to those platforms.</p>
Joint controller	Not applicable
Additional Data Processors	<p>Meltwater The Netherlands B.V., Singel 250, 1016 AB Amsterdam, The Netherlands</p> <p>Contact: privacy@meltwater.com</p> <hr/> <p>Sparkcentral Europe B.V. Kempische steenweg 311, Boîte 6.01 3500 Hasselt Belgium</p> <p>And</p> <p>Talkwalker S.à.r.l. 33, Avenue John F. Kennedy L-1855 Luxembourg Luxembourg</p>





Contact: <https://www.talkwalker.com/contact-us>

Collectively marketed as:

Hootsuite Inc.

111 East 5th Avenue,
3rd Floor

Vancouver, British Columbia V5T 4L1
Canada

Contact: <https://www.hootsuite.com/about/contact-us>

A combined privacy policy, that is applicable to all three companies can be found here:
<https://www.hootsuite.com/legal/privacy>

Pomilio Blumm S.r.l.

Lungomare Papa Giovanni XXIII, 22,
65126 Pescara PE,
Italy

- Contact: contact@pomilio.com
- Privacy Policy: <https://pomibliumm.eu/en/informative>



<p>Name and description of processing</p>	<p>Communication of EUAA work and information provision activities: The EUAA uses social media channels and platforms for the purpose of communicating a broad range of its activities to the public and providing 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 this is not done in a way that makes them identifiable.</p> <p>Measuring outreach in media and social media: The EUAA has contracted the services of Meltwater the Netherlands B.V. to observe the Agency’s outreach in traditional and online press markets, as well as on social media platforms. The social media outreach component, is handled by Hootsuite Inc.</p> <p>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.</p> <p>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, <i>e.g.</i> content written in German may be published in Member States where German is widely spoken.</p>
<p>Legal basis and lawfulness of processing</p>	<p>Personal data are processed to achieve the purposes as described in Articles 2(2), of Regulation (EU) 2021/2303¹ (hereinafter ‘the EUAA Regulation’) that states that “<i>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. (...)</i>”. The processing is lawful, under Article 5(1)(a) of Regulation (EU) 2018/1725² (hereinafter ‘the EUDPR’). To the extent that processing of personal data is based on the consent obtained from the data subjects, such processing is lawful also under point (d) of Article 5(1) of the EUDPR.</p>

¹. Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, OJ L 468, 30.12.2021, p. 1-54.

². 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.



<p>Purpose(s) of the personal data processing activities</p>	<p>The processing of personal data is necessary so that the Agency can successfully communicate a broad range of its activities to the public and to its stakeholders on the one part; as well as share information of relevance to potential international protection applicants and/or registrants of temporary protection, on the other.</p> <p>The processing of personal data is also necessary, for the Agency to assess the effectiveness and impact of its Communication Strategy and annual Communication Plans. To that end, the Agency uses aggregated performance-related statistics (<i>e.g.</i> number of views, likes and shares), as built-into the social media platforms themselves, or as provided for by the legal entities that the Agency has contracted for that purpose, and who are designated as data processors in this record.</p> <p>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.</p>
<p>Description of (categories of) data</p>	<p>In the context of communicating the EUAA’s work and information provision activities: Personal data relevant for audiovisual content such as voice recordings, video recordings, or images of data subject(s).</p> <p>In the context of measuring 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.</p> <p>In the context of promoted content: Personal data about users of social media platforms may refer to: geographical area.</p>
<p>Description of (categories of) data subjects</p>	<ul style="list-style-type: none"> • Personnel employed by the European Union Agency for Asylum (EUAA); • Personnel of the competent national authorities; • Users of social media platforms; • Applicants for international protection (portrayed in visual communication material, which is anonymised to ensure that no identification is possible)
<p>Retention period</p>	<p>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 materials are stored <i>a priori</i> for a period of 5 years and some of it will be part of the historic archive of the EUAA.</p>
<p>Recipients of the personal data</p>	<ul style="list-style-type: none"> • 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.



Transfers of personal data to third countries and/or international organisations	<p>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. 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.</p>
Automated decision-making including profiling	<p>No</p>
General description of security measures	<p>In addition to broader technical and organisational measures that the EUAA has in place for its IT infrastructure, to protect personal data necessary for the processing operations in question, the EUAA has put in place the following measures:</p> <ul style="list-style-type: none"> - 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 a limited number of authorised personnel of the EUAA has access to its social media accounts and their monitoring. Such personnel abide by statutory, and when required, additional confidentiality agreements.
How data subjects can exercise their rights	<p>By email to the Data Controller: press@euaa.europa.eu</p> <p>By e-mail to the Data Protection Officer (DPO): dpo@euaa.europa.eu</p> <p>By contacting the European Data Protection Supervisor (EDPS): supervision@edps.europa.eu</p>