



Privacy Statement¹

Information on the protection of your personal data

Processing for the management of subscription data of the Council of the EU and presidencies
websites - 289R02

1. Who is responsible for the handling of your personal data at the General Secretariat of the Council (GSC)?

General Secretariat of the Council (GSC)

Title of the controller: Head of Unit of the Digital Communication Unit –

Directorate-General Communication and Information (DG COMM)

webmaster.internet@consilium.europa.eu

2. Contact details of the GSC's Data Protection Officer.

Data Protection Officer

data.protection@consilium.europa.eu

3. What categories of personal data do we handle?

We handle the personal data of anyone who signs up to our email subscription system on the Council's website.

The categories of personal data we process via our email subscription system include:

- your first name (optional), surname (optional) and e-mail address (mandatory)
- your profession (this information is mandatory: you can make a selection from a drop-down list of preselected professional areas e.g EU Institution, national administration)
- information about your needs and preferences: product preferences (subscription to meetings or press releases), language(s)
- information about your subscription: time of registration and delivery, opening of e-mail alert, clicking on links in e-mail alerts, use of favourite device(s) and email client(s)

¹ Your personal data are handled in accordance with Regulation (EU) 2018/1725.



4. For what purpose do we handle your personal data?

Purpose:

We use personal data to ensure effective distribution of press material stored in the Council website and to improve our online services:

- To send you email notifications when new information is provided on the Council website, respecting the preferences they have indicated. The subscription system allows you to receive relevant information without the need to consult the Council website to check for the updates. The products are sent from the functional mailbox to the number of subscribed recipients
- To manage your personal data for creating e-mail address lists, storing, updating, modifying, unsubscribing
- To assist you with your subscription in case of troubleshooting
- To propose other products or services and/or provide information that may be of interest to you

Further purposes:

We might ask for your feedback and also collect statistics (e.g. collective opening rates and click through rates of an email campaign) about our products and services to improve our offering (e.g. to make content options more relevant, to improve user experience from a design and technical point of view)

The data stored and processed for these purposes do not allow for the identification of individual subscribers

We archive data in the public interest, within the meaning of Art. 4(1)(e) of Regulation (EU) 2018/1725.

5. What is the legal basis for the handling of your personal data?

The legal basis for the handling of your personal data is consent

6. If the legal basis is consent, you can withdraw it by:



You can withdraw your consent at any time by choosing the option to unsubscribe from the service. You can choose to unsubscribe via the Council website once you have logged in to your account.

7. If the legal basis is a contract, are you obliged to provide us with your personal data and what are the consequences of not doing so?

Not applicable

8. If we did not receive the personal data directly from you for this purpose, how did we obtain it?

Not applicable

9. Who are the recipients of your personal data?

Only a limited number of authorised staff that is involved in the management of the subscription service has access to your personal data on a “need-to-know” basis.

These include staff members from Brevo in charge of handling email subscriptions. The data processing takes place in accordance to the GSC’s specific instructions.

Personal data is processed by DG COMM of the General Secretariat of the Council: the Digital Communication Unit with admin rights, the Media Relations Unit, the Media Operations Unit, the Outreach Unit, the Graphics and Publications Unit and the Information Services Unit.

10. Will your personal data be transferred to a third country or an international organisation? If so, what safeguards are in place, if any?

Brevo applies a multi-cloud approach and uses different hosting providers and affiliates. These providers process production data and host back-ups. Some of these providers are located outside of the EU but localise their servers which are hosted within the EU. Affiliates located outside the EU provide part of customer support when the EU offices are closed.

Brevo’s servers are located in France, Belgium and Germany. Brevo has put in place a number of organisational and technical measures in place to guarantee this processing is compliant to EU law, including signing data protection clauses provided by the GSC and carrying out a data transfer impact assessment. The data protection impact assessment lists the sub contractors and



affiliate companies, including location of the companies, location of the servers, processing activity, as well as additional safeguards such as:

- Access to data: only authorised persons with contractual and confidentiality obligations can access the data
- The data cannot be read, copied or modified neither during processing nor transfer
- Data is processed separately for different purposes
- Storage: data is stored in the same data centres as Sendinblue France with data centres located in the EU
- There is no processing of metadata outside the EU
- Additional safeguards: encryption (only data centres in the EU can decrypt TLS), and pixel anonymisation

11. For how long will we keep your personal data?

Personal data is kept as long as you are subscribed to the email alerts. When you unsubscribe from the subscription services your e-mail address will be anonymised (e-mail address overwritten by a random code). Additionally, identification data (first name, surname and mobile number) and socio-demographic details (profession) will be removed, whilst data about interests and needs (product preferences, language(s)) will be kept for statistical purposes. GSC mandated staff can manually filter the database in search of inactive accounts which are then anonymized after a long period of inactivity (6 months).

12. Does the handling of your personal data involve automated decision-making, including profiling? What are the consequences for you?

Not applicable



13. What are your rights² and how can you exercise them?

You have the right of information and the right of access to your personal data.

You also have the right to correct and complete your data.

Under certain circumstances, you may have the right to obtain the erasure of your personal data, or the right to object to the handling of your personal data or to ask for it to be restricted.

You can exercise these rights by sending an email to the person responsible for the handling of your personal data (see point 1), with the Data Protection Officer (see point 2) in copy.

Together with your request, you must provide a copy of an identification document to confirm your identity (ID card or passport). This document should contain an identification number, country of issue, period of validity, your name, your address and your date of birth. Any other data contained in the copy of the identification document such as a photo or any personal characteristics may be blacked out.

(Not applicable to GSC staff)

14. Could your rights be restricted under Art. 25 of the Regulation (EU) 2018/1725?

Not applicable

15. You have the right to lodge a complaint with the European Data Protection Supervisor

edps@edps.europa.eu

Before you do so, it is recommended that you first try to obtain a remedy by contacting the person responsible for the handling of your personal data at the GSC (see point 1) and/or the Data Protection Officer (see point 2).

² Articles 17 to 22 of Regulation (EU) 2018/1725.