EDPB Website

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Index

1. Introduction
2. Who is responsible for the processing of your personal data and under which legal grounds is it processed?
3. What personal data do we collect and for what purpose?
4. Are your personal data subject to any international transfers?
5. Who has access to your personal data and to whom is it disclosed?
6. How do we protect your personal data?
7. For how long do we keep your personal data?
8. How can you verify, modify or delete your personal data?
9. How long do you have to wait to receive our reply to your data subject rights’ request?
10. Who can you contact to ask questions or exercise your rights?
11. Who can you contact to complain about the processing of your personal data?

1. Introduction

This privacy statement explains how the European Data Protection Board (“the EDPB”/“we”/“us”/“our”) processes personal data via its website.

Our website is our most important communication tool with which we inform the public of our work e.g. Guidelines, Opinions, Binding Decisions and any other documents that we adopt. Further, via our website, we communicate information on our Plenary meetings, their agenda and the outcome of the discussions, while providing other important information, such as on the work of the Coordinated Supervision Committee. Our website is also a tool by which we inform data subjects of the processing of their personal data.

Via our website, we may collect aggregated statistics with regard to its visitors e.g. on their approximate location and the pages within our website that they visited By knowing for example which pages of our website are more visited, we can work on improving the overall content of our website and through that improve our interaction with the public.

Some features of our website are used to collect personal data in the context of the EDPB activities. In particular, our website contains:
- a contact form,
- a form to submit feedback in cases of public consultations, and
- registers of decisions and compliance tools.
However, these processing operations are beyond the scope of the present specific privacy statement and they are described in detail in the relevant specific privacy statements\(^1\).

2. **Who is responsible for the processing of your personal data and under which legal grounds are they processed?**

The EDPB is the controller for the processing of personal data via its website.

The European Commission (“EC”) is a processor as it provides us with cloud services on the basis of the Cloud II Contract of the EC with Amazon Web Services EMEA SARL (“AWS”). Additionally, the EC is a processor in relation to Europa Analytics, the tool used in the EDPB website for the purpose of collecting aggregated statistics.

We use our website as our main communication tool to inform the public of our work. For this use, the processing of your personal data on our website is based on the necessity of that processing for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body as set out under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725\(^2\). The tasks in question are:

- informing the public about the guidelines, recommendations, and best practices that the EDPB issues in accordance with Article 70(1)(d) to (j), (m) GDPR\(^3\) or its annual report, in accordance with Article 71(1) GDPR; and
- the EDPB Secretariat’s responsibilities for communications with [other institutions and] the public and for the use of electronic means for the [internal and] external communication, as required in Article 75(6)(c) and (d) GDPR.

With regard to the processing of personal data for the purposes of aggregated statistics, the lawfulness of the processing is based on your consent for the processing of your personal data for one or more specific purposes, as set out under Article 5(1)(d) of Regulation (EU) 2018/1725.

We may also be required to process your personal data to comply with a legal obligation to which the EDPB is subject under Article 5(1)(b) and (2) of Regulation (EU) 2018/1725. This could be, for instance, when a relevant EU body (e.g. European Court of Auditors) carries out an audit or investigation, when we handle requests for access to documents under Regulation (EC) 1049/2001\(^4\) or if you request to exercise your data subject rights under Regulation (EU) 2018/1725.

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\(^1\) [https://edpb.europa.eu/edpb-specific-privacy-statements_en](https://edpb.europa.eu/edpb-specific-privacy-statements_en)

\(^2\) 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 (Text with EEA relevance.).

\(^3\) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).

3. What personal data do we collect and for what purposes?

3.1 Processed personal data

The following personal data are processed:

a. With regard to visitors of the EDPB website

- To establish the technical connection to our website, to ensure its security or for debugging purposes we process technical website connection information for https / IP/TCP connections, such as:
  - IP addresses;
  - HTTP Header fields (such as timestamp, URI, referrer, DNT (“do not track”) and user agent\(^5\)); and
  - the requested content or submitted request.

- To prepare aggregated statistics reports of visitors’ activity, we collect the following information via cookies, only where you consented to such processing:
  - IP address (masked);
  - Location: country, region, city, approximate latitude and longitude (Geolocation);
  - Date and time of the request (visit to the website);
  - Title of the page being viewed (Page Title);
  - URL of the page being viewed (Page URL);
  - URL of the page that was viewed prior to the current page (Referrer URL);
  - Screen resolution of visitor's device;
  - Time in local visitor's time-zone;
  - Files that were clicked and downloaded (Download);
  - Links to an outside domain that were clicked (Outlink);
  - Pages generation time (the time it takes for webpages to be generated by the webserver and then downloaded by the visitor: Page speed);
  - Main language of the browser being used (Accept-Language header);
  - Browser version, browser plugins (PDF, Flash, Java, …) operating system version, device identifier (User-Agent header);
  - Language of the visited page;
  - Campaigns;
  - Site Search;
  - Events;
  - Random unique Visitor ID;
  - Time of the first visit for the specific visitor;
  - Time of the previous visit for the specific visitor; and
  - Number of visits for the specific visitor.

- In all cases, we create a profile of data collected and associated via cookies to a specific data subject comprised of:

\(^5\) The user agent, depending on the data subjects device, may contain information such as the used browser, operating system, etc.
Record of whether consent was given or refused, in relation to the processing of aggregated statistics, and
Timestamp of when such consent was given or refused.

b. With regard to EDPB Secretariat staff members responsible for the content and technical management of the website

- Technical profile for access management:
  - user credentials;
  - e-mail address;
  - permissions;
  - role;
  - activity logs/audit trails; and
  - time-zone.

- Technical profile for content management:
  - content created by and/or assigned to the EDPB SEC staff member; and
  - time-stamp of publication/revision of content by the EDPB SEC staff member.

c. In terms of content of the EDPB website

The EDPB website contains:

- The names, roles, speaking engagements, contact details and in some instances the photos or videos of the EDPB members, including the EDPB Chair and Vice-Chairs, and
- The names of the EDPB Secretariat managers including their photos and reference to their roles.

3.2 Purposes of the processing

The purposes for which we process personal data in relation to our website are:

1. to technically enable the access to the content on the website [Technical connection];
2. to ensure that staff working for the EDPB Secretariat are able to manage our website both from a content and a technical point of view [Website administration];
3. when needed, to provide transparency, authenticity and integrity of specific content on our website, if personal data is necessary for such content, whether this may be a document for download or directly in the website [Content quality]6;
4. to ensure the security of the website, to prevent and counteract abuse and to ensure service continuity [Security]; and
5. to create aggregated statistics to improve our interaction with the public by enhancing the content of our website [Statistics].

4. Are your personal data subject to any international transfers?

No personal data are subject to international transfers.

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6 For example this is the case of documents that the EDPB adopts which the Chair signs on its behalf.
5. Who has access to your personal data and to whom are they disclosed?

Your personal data may be disclosed to the following:

- The general public, for the personal data published on our website, as referred to under point 3.1.c above;
- The EDPB Secretariat staff members, on a need to do and need to know basis;
- Members of the EDPB, where necessary;
- The European Commission: where necessary, in the context of its participation in the EDPB activities; as a processor; and to provide aggregated analytics via Europa Analytics;
- AWS as a sub-processor;
- Bodies charged with a monitoring or inspection task in application of EU law, e.g. OLAF, European Ombudsman, EDPS, Court of Auditors, as well as staff of other services, where necessary in the context of official investigations or for audit purposes;
- The Court of Justice of the European Union, where necessary;
- Members of the public in the context of requests for access to documents, where necessary; in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83.

6. How do we protect your personal data?

Any personal data collected by the EDPB is kept in restricted access servers, available only to authorised staff through adequate IT security measures. In general, technical measures applied by the EDPB, the EC (acting as a processor) and its sub-processors include appropriate actions, taking into consideration the risk presented by the processing and the nature of the personal data being processed, to:

- address online security; and
- to protect server hardware, software and the network from accidental or malicious manipulations and from the risk of data loss, alteration of data or unauthorised access.

This includes, but is not limited to, server redundancy (high availability), the creation and storage of on- and offline back-ups, patching policies, encryption and hardware monitoring.

In particular, the AWS Network will be electronically accessible only to employees, contractors and any other person as necessary to provide the Services. AWS will maintain access controls and policies to manage what access is allowed to the AWS Network from each network connection and user, including the use of firewalls or functionally equivalent technology and authentication controls. AWS will maintain corrective action and incident response plans to respond to potential security threats.

All related operations abide by the European Commission’s Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission. The data can only be accessed by designated EC staff using a user ID and a password.

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Further, physical access and logical access is granted only on a need to know and need to do basis, following the least privilege principle. The EC restricts access to personal data to authorised personnel with a legitimate need to know for the purposes of this processing operation. Such staff abide by statutory and, when required, additional confidentiality agreements.

The EC, in its role as a processor, is, by contract, required to implement equivalent measures by means of a contract or other legal act under Union or Member State law regarding any sub-processor, in line with Article 29(3)(d) Regulation (EU) 2018/1725. Security measures by the hosting service are regularly tested and verified by third party auditors.

All sub-processors of the EC, including AWS, are bound by agreements including a specific contractual clause for any processing operations of personal data on behalf of the EC, and by the confidentiality obligations deriving from the GDPR.

7. For how long do we keep your personal data?

Personal data of visitors processed for the purposes of ensuring their access to the website are kept for the duration of the session.

Personal data processed for the purposes of the security of the website are kept for 12 months. Afterwards, logs are aggregated and automatically erased.

Europa Analytics automatically deletes visitors' logs after 13 months. The cookie which records whether consent was given or refused has a life-span of 6 months.

Personal data of the EDPB Secretariat staff members are kept:
   a. For the duration that their professional account remains active;
   b. Personal data relating to debugging, including activity logs/audit trails are kept for 6 months after the connection.

Content on our website is made publicly available indefinitely, although it can be regularly updated or modified. We keep such content indefinitely.

At the end of the retention periods mentioned above, if the personal data are contained in documents with historical or administrative value which are selected for preservation in the EDPB records, the selected personal data will be kept indefinitely and – unless an exemption applies – will be made public in accordance with the Regulation (EEC, EURATOM) 354/83 on the opening to the public of historical archives after 30 years.

8. How can you verify, modify or delete your personal data?

As the individual to whom the personal data relate, you can exercise the following rights:
   1. access to your personal data under Article 17 of Regulation (EU) 2018/1725;
   2. rectify your personal data under Article 18 of Regulation (EU) 2018/1725;
   3. erase your personal data under Article 19 of Regulation (EU) 2018/1725;
4. restrict the processing concerning yourself under Article 20 of Regulation (EU) 2018/1725; or
5. exercise the right to data portability under Article 22 of Regulation (EU) 2018/1725.

Please note that these rights are not absolute rights, which means that some exceptions may apply. These rights are applied on a case-by-case basis.

In addition, you can object to the processing of your personal data under Article 23 of Regulation (EU) 2018/1725 for reasons relating to your particular situation. When you contact us to exercise this right, please explain these reasons. We will remove your personal data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms.

We do not use your personal data for any automated decision-making.

You can withdraw your consent to the processing of your data for aggregated statistics at any time, without any consequence, and as easily as you have provided it (i.e. by clicking on the button “refuse” which is available at the bottom of this page). However, please be aware that this will not affect the lawfulness of the processing based on your consent prior to withdrawing it.

To exercise your rights as a data subject, please see sections 10 and 11 below.

9. How long do you have to wait to receive our reply to your data subject rights’ request?

After receiving your request, we have one month to provide information on action taken on your request. We may extend this period by two further months, taking into account the complexity and number of the requests. In those cases, we will inform you of the extension and its reasons within one month of receipt of your request.

10. Who can you contact to ask questions or exercise your rights?

If you have questions, or wish to exercise your rights as a data subject, please contact us at edpb@edpb.europa.eu or via our website’s contact page (selecting the option “Requests for the EDPB DPO”).

11. Who can you contact to complain about the processing of your personal data?

We encourage you to always contact us first to raise your questions or concerns.

In any case, you remain entitled to send a complaint to the European Data Protection Supervisor (EDPS), using the following contact information:
European Data Protection Supervisor (EDPS)
Rue Wiertz 60
B-1047 Brussels, Belgium
edps@edps.europa.eu
https://edps.europa.eu/