

## EDPB Personal data records of processing activities (Article 31 of the Regulation 2018/1725<sup>1</sup>)

Record of EDPB activities processing personal data, based on Article 31 of 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.

Nr.	Item	Description
1.	Title of the processing operation	EDPB website
2.	Number of record	EDPB-0009
3.	Last updated	March 2024
4.	Data controller	European Data Protection Board Edpb [at] edpb.europa.eu Rue Montoyer, 30 Belgium, Brussels
5.	Joint controllers	N/A
6.	Processor(s)	The European Commission ("EC") is a processor as it provides 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.

<sup>&</sup>lt;sup>1</sup> Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the EU institutions, bodies, offices and agencies.



7.	Data Protection	EDPB Data Protection Officer
	Officer (DPO)	Edpb-dpo [at] edpb.europa.eu
		Rue Montoyer, 30
		Belgium, Brussels
8.	Description of the processing operation	<ul> <li>information about its work, such as Guidelines, Opinions and Binding Decisions; ensures that the public is informed of its activities such as its Plenary meetings, their agenda and outcome of discussions; and communicates other information as necessary, such as providing information 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.</li> <li>Via our website, we may collect aggregated statistics about its visitors, e.g. on their approximate location and the</li> </ul>
		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, the website contains: • a contact form,
		<ul> <li>a form to submit feedback in cases of public consultations, and</li> <li>registers of decisions and compliance tools).</li> </ul>
		These forms and registers involve the processing of personal data that is beyond the scope of the present record, and are detailed in the relevant data protection notices and records <sup>2</sup> .
9.	Purpose of	Personal data are processed for the following purposes:
	processing	1. to technically enable the access to content on the website [Technical connection];
	operation	2. to ensure that staff working for the EDPB Secretariat are able to manage the EDPB Website both from a content and a technical point of view [Website administration];

<sup>&</sup>lt;sup>2</sup> <u>https://edpb.europa.eu/edpb-centralised-register-records en and https://edpb.europa.eu/edpb-specific-privacy-statements en</u>



		<ol> <li>when needed, to provide transparency, authenticity and integrity of specific content on our website if the personal data is necessary for such content, whether this may be it a document for download or directly in the website [Content quality]<sup>3</sup>;</li> <li>to ensure the security of the Website, to prevent and counteract abuse and to ensure service continuity [Security]; and</li> <li>to create aggregated statistics to improve our interaction with the public by enhancing the content of our website [Statistics].</li> </ol>
10.	Legal basis	<ul> <li>The processing of personal data for the purposes 1-4 above is based on the necessity of 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<sup>4</sup>. The tasks in question are: <ul> <li>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<sup>5</sup> or its annual report, in accordance with Article 71(1) GDPR; and</li> <li>the EDPB Secretariat's responsibilities for communication with [other institutions and] the public and for the use of electronic means for the [internal and] external communication, as required under Article 75(6)(c) and (d) GDPR.</li> </ul> </li> <li>With regard to the processing of personal data for the purposes of statistics (purpose 5 above), the lawfulness of the processing is based on the data subject's consent for the processing of their personal data for one or more specific purposes, as set out under Article 5(1)(d) of Regulation (EU) 2018/1725.</li> </ul>
		Further, the EDPB may be required to store and further process personal data in the context of any audits or enquiries by specific EU bodies, when we handle requests for access to documents under Regulation (EC) 1049/2001 <sup>6</sup> , or if data subjects request to exercise their rights under Regulation (EU) 2018/1725. In such cases,

<sup>&</sup>lt;sup>3</sup> For example this is the case of documents that the EDPB adopts which the Chair signs on its behalf.

<sup>&</sup>lt;sup>4</sup> 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. <sup>5</sup> 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).

<sup>&</sup>lt;sup>6</sup> Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.



11.	Description of categories of data subjects	<ul> <li>lawfulness of processing is based on the necessity of such processing for compliance with a legal obligation to which the EDPB is subject under Article 5(1)(b) and 5(2) of Regulation 2018/1725. The legal obligations are foreseen in different legislation applicable to the different institutions responsible for auditing and inspections.</li> <li>Visitors of the EDPB website;</li> <li>EDPB Secretariat staff members responsible for the content of the website;</li> <li>EDPB members and EDPB Secretariat staff members referred to in the website.</li> </ul>
12.	Description of processed personal data / categories	<ul> <li>The following personal data are processed:</li> <li><u>a. With regard to visitors of the EDPB website:</u> 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: <ul> <li>IP addresses;</li> <li>HTTP Header fields (such as timestamp, URI, referrer, DNT and user agent<sup>7</sup>);</li> <li>the requested content or submitted request.</li> </ul> </li> <li>To prepare aggregated statistics reports of visitors' activity, we collect the following information via cookies, only where data subjects consented to such processing: <ul> <li>IP address (masked);</li> <li>Location: country, region, city, approximate latitude and longitude (Geolocation);</li> <li>Date and time of the request (visit to the website);</li> <li>Title of the page being viewed (Page Title);</li> <li>URL of the page that was viewed prior to the current page (Referrer URL);</li> <li>Screen resolution of visitor's device;</li> <li>Time in local visitor's time-zone;</li> <li>Files that were clicked and downloaded (Download);</li> <li>Links to an outside domain that were clicked (Outlink);</li> </ul> </li> </ul>

<sup>&</sup>lt;sup>7</sup> The user agent, depending on the data subject's device, may contain information such as the used browser, operating system, etc.



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• Pages generation time (the time it takes for webpages to be generated by the webserver and then
downloaded by the visitor: Page speed);
<ul> <li>Main language of the browser being used (Accept-Language header);</li> </ul>
• Browser version, browser plugins (PDF, Flash, Java,) operating system version, device identifier (User-
Agent header);
<ul> <li>Language of the visited page;</li> </ul>
<ul> <li>Campaigns;</li> </ul>
<ul> <li>Site Search;</li> </ul>
• Events;
<ul> <li>Random unique Visitor ID;</li> </ul>
• Time of the first visit for the specific visitor;
<ul> <li>Time of the previous visit for the specific visitor; and</li> </ul>
<ul> <li>Number of visits for the specific visitor.</li> </ul>
• In all cases, we create a profile of data collected and associated via <b>cookies</b> to a specific data subject, comprised of:
<ul> <li>Record of whether consent was given or refused, in relation to the processing of aggregated statistics;</li> <li>Timestamp of when such consent was given or refused.</li> </ul>
b. With regard to EDPB Secretariat staff members responsible for the content and technical management of the
website:
• Technical profile for access management:
$\circ$ user credentials;
$\circ$ e-mail address;
o permissions;
o role;
o activity logs/audit trails; and
o time-zone.
• Technical profile for content management:



		<ul> <li>content created by and/or assigned to the EDPB SEC staff member; and</li> <li>time-stamp of publication/revision of content by the EDPB SEC staff member.</li> </ul>
		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.
13.	Description of procedure to ensure data subjects' rights	A specific privacy statement is published on the EDPB website (https://edpb.europa.eu/edpb-specific-privacy-statements_en).
14.	Description of recipients of personal data	<ul> <li>The general public, for the personal data published on our website, as referred to under point 12.c above;</li> <li>The EDPB Secretariat staff members, on a need to do and need to know basis;</li> <li>Members of the EDPB, where necessary;</li> <li>The European Commission: where necessary, in the context of its participation in the EDPB activities; as a processor;</li> <li>AWS as a sub-processor;</li> <li>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;</li> <li>The Court of Justice of the European Union, where necessary;</li> <li>Members of the public in the context of requests for access to documents, where necessary, in accordance with</li> </ul>
15.	Description of	the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83 <sup>8</sup> . No transfers to third countries are foreseen in this case.
	transfers	

<sup>&</sup>lt;sup>8</sup> Council Regulation (EEC, Euratom) No 354/83 of 1 February 1983 concerning the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community ("Regulation on the opening to the public of historical archives on historical archives").



16.	Description of envisaged time limits for retention for each processing operation	Personal data of visitors processed for the purposes of ensuring their access to the website are kept for the duration of the session i.e. for 30 minutes. 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 visitor logs after 13 months. The cookie which records whether consent was given or refused has a life-span of 6 months.
		<ul> <li>Personal data of the EDPB Secretariat staff members are kept:</li> <li>a. For the duration that their professional account remains active;</li> <li>b. Personal data relating to debugging, including activity logs/audit trails are kept for 6 months after the connection.</li> </ul>
		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 above retention periods, 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) 354/83on the opening to the public of historical archives after 30 years.
17.	General description	Technical Measures
	of technical and organisational security measures referred to in Article 33	<ul> <li>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:</li> <li>address online security; and</li> </ul>
		<ul> <li>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.</li> <li>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.</li> </ul>



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 EC. The data can only be accessed by designated EC staff using a user ID and a password.
Organisational measures
Physical 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.
Further, 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 Regulation (EU) 2016/679.