

## European Data Protection Board (EDPB) Specific Privacy Statement (SPS)

### **EDPB LinkedIn Page**

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#### **1. Introduction**

This privacy statement explains how the European Data Protection Board (“the EDPB”/“we”/“us”/“our”) processes personal data in the context of the management of its EDPB Page on LinkedIn for reasons relating to our core business, including when we consult anonymous statistical data, as well as to be compliant with the legal obligations incumbent on us. Other purposes for which we process personal data via our LinkedIn page will be covered by different privacy statements.

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

The EDPB is the controller for the processing of personal data in the context of the management of its Page on LinkedIn.

With regard to the production of anonymous statistics of users visiting the EDPB Page on LinkedIn, LinkedIn Ireland Unlimited Company and the EDPB are joint controllers. LinkedIn is also a separate controller for the personal data which it processes. To learn more about how this platform processes your personal data, we encourage you to read its privacy policy (available here: <https://www.linkedin.com/legal/privacy-policy>).

We use our LinkedIn Page to communicate with the general public about EDPB activities, raise awareness about data protection issues and direct citizens with questions to appropriate EDPB communication channels (e.g. the EDPB “contact us” page on the EDPB website). In that

context, and to improve our interaction with the public, we consult the anonymous statistics that LinkedIn provides about the engagement of users with the EDPB Page. For these uses, the processing of your personal data 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<sup>1</sup>. The task in question is the responsibility of the EDPB Secretariat, which manages the EDPB Page on LinkedIn for communications with other institutions and the public, as provided in Article 75(6)(c) GDPR.

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<sup>2</sup> or if you request to exercise your data subject rights under Regulation (EU) 2018/1725.

### **3. What personal data do we collect and for what purpose?**

#### ***3.1 Processed personal data***

- We may post information on the EDPB Chair, EDPB Deputy Chairs, the Head of the EDPB Secretariat or other staff members of the EDPB, the Coordinated Supervision Committee (“CSC”)<sup>3</sup> or the EDPB Secretariat in relation to their activities under their respective roles, e.g. public speaking engagements. We may also refer to the persons with whom they may hold meetings (e.g. EC Commissioners, MEPs).
- In relation to users of LinkedIn who interact with our LinkedIn page, we may process the following categories of personal data that users have themselves made public on LinkedIn:
  - the users’ names and surnames;
  - any other personal data made available by these users of LinkedIn, such as, but not limited to, their LinkedIn username, contact details, picture, views, questions addressed to the EDPB as well as their reactions to a post or comment or answer where the EDPB is tagged (like, share, repost, comment);
- LinkedIn produces anonymous statistics in relation to the demographics of the users interacting with the EDPB Page on LinkedIn, as well as clicks, engagement rate and overview of evolution of posts over time. This includes the user’s job function, country, industry, seniority, company size, and employment status data, as well as whether a person is following our page or not.

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<sup>1</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 (Text with EEA relevance.).

<sup>2</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.

<sup>3</sup> [https://edpb.europa.eu/csc/about-csc/who-we-are-coordinated-supervision-committee\\_en](https://edpb.europa.eu/csc/about-csc/who-we-are-coordinated-supervision-committee_en)

- As provided by the Terms of LinkedIn, the creation of the EDPB Page on LinkedIn required the EDPB staff members who manage it to link the page to their personal LinkedIn account<sup>4</sup>. These staff members have linked their professional EDPB email addresses to the EDPB LinkedIn Page.

It cannot be excluded that users of LinkedIn post information that fall in one of the special categories of personal data. This is not under the control of EDPB and it would fall outside our intended use of LinkedIn, as described above. In such a case, we will ask the person to delete this information and we will propose alternative channels for such submissions e.g. by indicating to them the Supervisory Authority that they could contact in this respect.

### ***3.2 Purpose of the processing***

Through our Page on LinkedIn, we communicate with the general public about EDPB activities, raise awareness about data protection issues and direct citizens with questions to appropriate EDPB communication channels whenever necessary (e.g. EDPB “contact us” page on the EDPB website). In that context and to improve our interaction with the public, we use the anonymous statistics that LinkedIn provides in relation to the engagement of users with the EDPB Page.

In addition, in some limited cases, content from LinkedIn could be shared with the staff members of the EDPB or the EDPB Secretariat staff members also for communication purposes, such as understanding the public’s reaction to an EDPB document for the purpose of ensuring proper communication. In these cases, such content may also be processed for record keeping purposes.

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

Please note that LinkedIn may transfer outside of the EU your personal data processed for the purpose of producing anonymous statistics. LinkedIn has adhered to the EU-U.S. Data Privacy Framework (DPF)<sup>5</sup>.

## **5. Who has access to your personal data and to whom is it disclosed?**

Personal data contained in the EDPB’s posts on LinkedIn are primarily visible to registered users of LinkedIn. LinkedIn also allows unregistered users to view only a limited number of pages, who may therefore be able to view some of the personal data contained in the EDPB’s posts.

In addition, as indicated above, any content on LinkedIn which we may share within the EDPB for communication purposes can also be accessible, in particular, by

- The EDPB Secretariat staff members, on a need-to-know/need-to-do basis;

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<sup>4</sup> <https://www.linkedin.com/legal/linkedin-pages-terms>

<sup>5</sup> [https://www.linkedin.com/help/linkedin/answer/a1343190?trk=microsites-frontend\\_legal\\_privacy-policy&lang=en-us&intendedLocale=en](https://www.linkedin.com/help/linkedin/answer/a1343190?trk=microsites-frontend_legal_privacy-policy&lang=en-us&intendedLocale=en)

<sup>6</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.

- Members of the EDPB, where necessary;
- The European Commission, where necessary, in the context of its participation in the EDPB activities;
- Bodies charged with monitoring or inspection tasks in application of EU law, e.g. OLAF, European Ombudsman, EDPS as a supervisory authority, 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, in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83<sup>6</sup>.

## 6. How do we protect your personal data?

As the personal data processed are those which have already been made publicly available, no confidentiality measures are required.

Access to the EDPB Page on LinkedIn is password protected. The EDPB Secretariat staff members who manage our Page on LinkedIn only connect to it via their professional devices (e.g. professional laptop or mobile phone). The statistics that are provided to the EDPB are strictly anonymous. When content from LinkedIn is extracted, as indicated in point 3.2 above, it is saved in password-protected servers, with access limited on a need-to-know or need-to-do basis through adequate IT security measures. Physical access to our premises is protected and restricted to authorised personnel only.

In general, technical measures include appropriate actions to address online security, protect server hardware, software and the network from accidental or malicious manipulations and risk of data loss, alteration of data or unauthorised access. When determining whether an action is appropriate, we will take into consideration the risk presented by the processing and the nature of the personal data being processed.

The EDPB has disabled the possibility for direct messages via its LinkedIn Page and therefore no additional personal data that has not already been made public are processed via this Page.

Further, the EDPB Secretariat staff members having access to the account limit the posting of information that could qualify as personal data to the minimum necessary.

The EDPB Page on LinkedIn is used primarily to communicate information / raise awareness about EDPB activities and very rarely is it used for other purposes. Posts on LinkedIn are not signed.

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

Any personal data we process in the context of our interaction with you as a user of LinkedIn and our Page on LinkedIn are kept on the EDPB Page for as long as this Page exists, unless you decide to delete your post or account, in which case the usage policies of LinkedIn<sup>7</sup> apply.

Unless comments, views, LinkedIn usernames or other personal data are selected for preservation in the EDPB records (as described below), this data is kept for a maximum of two years.

At the end of this retention period, 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 Regulation (EEC, EURATOM) 354/83<sup>8</sup> 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.

In order to exercise your rights in relation to personal data processed for the production of anonymous statistics, please consult the relevant LinkedIn page. This information is available at <https://www.linkedin.com/help/linkedin/answer/a1338708>.

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<sup>7</sup><https://www.linkedin.com/help/linkedin/answer/a522451/unable-to-retrieve-deleted-articles?lang=en-us&intendedLocale=en-us>  
[https://www.linkedin.com/help/linkedin/answer/a1336281/data-retention?lang=en-us&intendedLocale=en#:~:text=If%20you%20close%20your%20account noted%20in%20our%20Privacy%20Policy](https://www.linkedin.com/help/linkedin/answer/a1336281/data-retention?lang=en-us&intendedLocale=en#:~:text=If%20you%20close%20your%20account%20noted%20in%20our%20Privacy%20Policy).

<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.

Under Article 28(3) Regulation 2018/1725 and Article 26(3) GDPR, you are also entitled to exercise your rights under those Regulations in respect of and against each of LinkedIn and the EDPB.

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](mailto:edpb@edpb.europa.eu) or via our [website's](#) contact page (selecting the option "Requests for the EDPB DPO").

In relation to personal data processed for the production of anonymous statistics, please consult the relevant LinkedIn page: <https://www.linkedin.com/help/linkedin/answer/a1338708>

You may contact the DPO of LinkedIn using the form in the following page: <https://www.linkedin.com/help/linkedin/ask/TSO-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](mailto:edps@edps.europa.eu)  
<https://edps.europa.eu/>

In relation to personal data processed for the production of anonymous statistics, please consult the following page:  
<https://www.linkedin.com/help/linkedin/answer/a1339576>