

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

EDPB Media Communications and Media Contact List

Last updated: February 2021

1. Introduction

As stipulated in article 75(6)(c), the EDPB, through its secretariat, communicates with other institutions and the public, using, where necessary, electronic means for said communication (see article 75(6)(d)). Part of this external communication involves informing media outlets of its activities, including: newspapers, press agencies, websites and other press actors for purposes such as inviting the press to press conferences and briefings; reaching out to the press with news; answering press queries; and assisting the press in setting up interviews with the Chair/Board members.

In order to be able to ensure these communication activities, the EDPB has created a media contact list. Said list contains limited personal data of press members, in particular contact details, which are used to bilaterally exchange information about the EDPB's activities and any other matters related to the performance of its tasks. Such contact list is managed by the EDPB's secretariat Communications team.

The responsible for this processing operation is the EDPB. This processing is necessary for the communication, with journalists and the press, about the EDPB's activities and any other matters related to the performance of its tasks. Concerning the EDPB's general tasks of communication with the press, lawfulness is ensured by compliance with articles 5(1)(a) ("Processing is necessary for compliance with a legal obligation to which the controller is subject"), and 5(2) of Regulation 2018/1725.

As for the press contact list, it is based on consent of data subjects. Therefore, lawfulness is ensured by compliance with article 5(1)(d) and 7 of Regulation 2018/1725.

Where the EDPB is required to keep data for the purposes of audits and investigations by relevant EU bodies, the lawfulness of said processing rests on article 5(1)(b) and (2) of regulation 2018/1725.

2. What personal information do we collect, for what purpose and through which technical means?

2.1 Processed personal data

In order to communicate with the press, the following personal data are processed:

-) Journalist contact details (specifically name, surname, email address, name of media outlet and phone number, where made available by the journalist, or publicly retrievable).

The press contact list includes the following personal data:

- J Journalists contact details (including name, surname, name of media outlet, email address, phone number).

2.2 Purpose of the processing

The purposes of processing are two-fold:

- (i) perform the necessary communication tasks of the EDPB with the media, as stipulated in article 75(6) GDPR;
- (ii) create a database that allows the EDPB to be in contact with the media and ensure an adequate and timely communication with the public.

2.3 Technical means

General communication occurs via email (including outlook contact list) or, where relevant / necessary, fixed / mobile phone.

The contact list is kept in electronic format. In certain instances, for communication purposes, phone numbers may be kept in a mobile phone of the communications' team, used only for professional purposes.

3. Who has access to your information and to whom it is disclosed?

The following entities have access to your information:

- J The EDPB and its Secretariat, namely the communications team, for the performance of their communication related tasks, and other EDPB SEC staff members, on a need-to-know / need-to-do basis;
- J Members of the Board including the Chair, where necessary and relevant (e.g. requests for interviews, among others);
- J Bodies charged with monitoring or inspection tasks in application of EU law, where necessary in the context of official investigations or for audit purposes;
- J Members of the public in the context of requests for access to documents, where the relevant exceptions do not apply.¹

4. How do we protect and safeguard your information?

All personal data handled by the EDPB is kept on restricted, password-protected servers, available only to staff, EDPB members and the European Commission, on a need-to-know and need-to-do basis. Physical access to the premises of the EDPB is protected, and restricted to authorized personnel.

¹ 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, OJ L 145, 31.5.2001, p. 43–48

Journalists contact details are kept on an excel sheet, available mainly to the communications team of the EDPB. Where necessary, contact details are kept on a mobile phone for bilateral communications with the press. Such means of communication are required due to journalists' short deadlines, which results in calls being placed to the communications team (and vice-versa). Said mobile phone is password protected and used for professional communications only.

5. How can you verify, modify or delete your information?

You can withdraw your consent to be on our press communications list at any time, without any consequence, and as easily as you have provided it (i.e. by sending an email to the contacts indicated below or directly to one of our press officers).

You have the right to request from the data controller (the EDPB) access to, rectification or erasure of your personal data, restriction of processing concerning the data subject or, where applicable, the right to data portability. Please note that the rights provided to data subjects are not absolute rights and may be subject to exceptions, which may be applied on a case-by-case basis.

You can object to the processing of your personal data on grounds relating to your particular situation, by stating said grounds in an email sent to the controller. If the controller (the EDPB) is not able to demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, the controller will remove the personal data categories indicated in section 2.1 above. The same applies to the processing for the establishment, exercise or defence of legal claims.

To exercise your rights as a data subject, see the "Contact information" section of this SPS below.

6. For how long do we keep your data?

Personal data concerning general communication with the press (i.e. email exchanges, interview requests, requests for information, among others) are kept for five years.

The contact list is regularly updated and therefore personal data is kept for as long as necessary in order to allow the EDPB and its Secretariat to perform its tasks. Data subjects and their personal data are removed from the table at their request or in the event that they cease to be press affiliated (and the EDPB becomes aware of such fact).

7. Time limit for addressing your data modification request

The time limit for treating the data subject's request and modifying the database fields is one month. This period may be extended by two further months where necessary, taking into account the complexity and the number of the requests. In those cases, the EDPB will inform the data subject of the extension within one month of receipt of the request and will provide reasons for the delay.

8. Contact information

In case you have questions, or wish to exercise your rights as a data subject, please contact the European Data Protection Board (the data controller), using the following contact information: edpb@edpb.europa.eu. You can also directly contact the EDPB Data Protection Officer, at edpb-dpo@edpb.europa.eu.

9. Resources

Complaints can be addressed to the European Data Protection Supervisor (EDPS) at the following address:

European Data Protection Supervisor (EDPS)
Rue Wiertz 60
B-1047 Brussels
Belgium
Phone: +32 2 283 19 00
Email: edps@edps.europa.eu