# EEAS PRIVACY STATEMENT

## FOR THE PURPOSE OF THE PROCESSING OPERATION

**EEAS Newsletter 'Disinformation Review'**

### 1. INTRODUCTION

The protection of your privacy, including your personal data, is of great importance to the European External Action Service (EEAS), thereby reflecting the provisions of the Charter on Fundamental Rights of the European Union, and in particular Art. 8 thereof. This privacy statement describes how the EEAS processes your personal data for the purpose it has been collected and what rights you have as a data subject.

Your personal data are processed in accordance with Regulation (EC) 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data and its successor legislative act, aligned with the provisions of the General Data Protection Regulation (Reg. (EU) 2016/679).

All data of a personal nature - namely data that can identify you directly or indirectly - which you provide to the EEAS will be handled with the necessary care.

### 2. PURPOSE OF THE PROCESSING OPERATION

The purpose of the processing operation is to allow the distribution of a newsletter, developed and serviced by the EEAS East StratCom Task Force, called "Disinformation Review", to subscribers from EU institutions, EU Member State administrations and partner countries, NGO and think tank representatives, journalists and any other interested citizens.

### 3. DATA PROCESSED

The data which will be processed for that purpose are the following:

- Email address (required)
- First name / Last name (voluntary)
- Job title/profession (voluntary)
- Organisation (voluntary)
- Country (voluntary)

Security measures related to the data processed

Based on assessing risks with regard to the recruitment of Local Agents, the EEAS ensures that adequate organisational and technical measures are in place in order to safeguard your personal data. The technical and organisation measures are assured pursuant to the provisions on data security in accordance with Art 22 of Regulation (EC) 45/2001 and its successive legislative act. Security measures ensured by Mailchimp are described under point 14 of the 'Security' Section of Mailchimp privacy policy.

### 4. CONTROLLER OF THE PROCESSING OPERATION

The Controller determining the purpose and the means of the processing operation is the European External Action Service. The organisational entity responsible for managing the personal data processing operation is the Strategic Communications Division, EEAS SG.AFFGEN.1 and its East StratCom Task Force, under the supervision of the Head of Division or his/her Deputy acting on his/her behalf.

### 5. RECIPIENTS OF THE DATA

The recipients of your data will be designated members of the East StratCom Task Force as well as the selected provider for the email distribution systems, a third country service provider, MailChimp, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, United States.

In order to gather subscriber feedback about the Disinformation Review and optimise the content provided in the newsletter, email opens as well as link clicks in the emails are also tracked. Such statistics, in anonymised form, are part of the regular EEAS in-house reporting, which serves to evaluate the activity of the East Stratcom Task Force.

Please note that with respect to the tracking of email opening and link clicks, it is Mailchimp's policy to ignore any Do Not Track signal from your device. We trust that you as a user are aware that you may be tracked in case you open e-mails and click on links. Beyond tracking of opening rates and link clicks, no additional tracking will be performed on subscribers to the Disinformation Review.

Subscribers that click on the link "view this email in your browser" in the Disinformation Review visit a Mailchimp website. This could trigger the setting of certain cookies and the use of tracking technology. Users can control the dropping of cookies through their browser settings. For more information about the protection and use of data gathered when visiting a Mailchimp website, please see the Mailchimp privacy policy.
6. PROVISION, ACCESS AND RECTIFICATION OF THE DATA
You have the right to access your personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of your personal data, which will be implemented within 10 working days after your specific request will have been deemed legitimate. If you have any queries concerning the processing of your personal data, you may address them to the data controller at the following functional mailbox: stratcom-east@eeas.europa.eu.

7. LEGAL BASIS FOR THE PROCESSING OPERATION
The legal basis of the processing operation at stake is:
- The East StratCom Task Force was mandated by the March 2015 European Council to "challenge Russia's ongoing disinformation campaigns" (see European Council conclusions, point 13)
- To raise awareness of disinformation, the Task Force produces a weekly newsletter called "Disinformation Review".
- The choice of Mailchimp as a provider followed benchmarking among other offers.

8. TIME LIMIT FOR STORING DATA
During your subscription to Mailchimp, your data will be stored by Mailchimp, the EEAS’ service provider for the Disinformation Review. EEAS will ensure that Mailchimp does not retain your data beyond the end of your subscription to Mailchimp. For this purpose, EEAS will manually delete the data of those recipients that have unsubscribed from the Disinformation Review at regular intervals. For further information about the retention period of data on the Mailchimp server, see Mailchimp privacy policy, point 18.

9. CONTACT
In case you have questions related to the protection of your personal data, you can also contact the EEAS’ Data Protection Office at data-protection@eeas.europa.eu.

10. RECOUSE
You have at any time the right of recourse to the European Data Protection Supervisor at edps@edps.europa.eu.