



EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO

ORGANISATION OF THEMATIC CAMPAIGNS AND COMMUNICATION ACTIVITIES

ORGANISED BY EU DELEGATION TO SYRIA

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the External Action Service (EEAS) including the Delegations to the European Union. You have the right under EU law to be informed when your personal data is processed [collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with Regulation (EU) 2018/1725 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, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and the EU Delegations process your personal data and what rights you have as a data subject.

2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The purpose of the processing is to ensure appropriate organisation and management of thematic campaigns and communication activities for the EU Delegation to Syria from March 2023 to 30 June 2024.

- Set up and management of the Network of Practitioners includes the recruitment, selection, management and set up of the Network, organisation of meetings and workshops with practitioners to feed the thematic campaigns.
- Thematic campaigns on the Right to Education, human rights and transitional justice, and health and agriculture includes the organisation of cartoon workshops with children, an online talent show contest for young people, radio talk shows with beneficiaries, testimonial videos, influencers testimonials/partnerships, and social media publications about beneficiaries and activities, seminars, media workshops, and other panels.
- Publication and communication activity related to the thematic campaigns for dissemination purposes includes the taking of photos and videos, radio talk shows, web streaming, audio or video recording during the activities and events, and the publication of these photos, videos and of other information about the event on the EEAS website, EUD social media accounts, and stakeholders/implementing partners websites.

The EEAS may use photos mentioned above in its communication activities based on your consent.

In case the event is organised with the support of an external company (contractor) processing personal data, including the provision of an online platform, a data protection clause in the service contract ensures the protection of your personal data. Your personal data will not be used for automated decision-making including profiling.

3. DATA PROCESSED: What data do we process?

I. Personal data will be collected, used and kept only to the extent necessary for the purposes above. Data, including personal data, that may be processed, are the following:

- For the set up and management of the Network of Practitioners (via the EUSurvey): Identification and contact data, including name, title, gender, profession, function, e-mail address, phone numbers of candidates and members of the Network
- For the thematic campaigns: Identification and contact data of audiences, beneficiaries and stakeholders, including name, title, gender, profession, function, e-mail address, phone numbers, location/region, emergency contacts if required.
- For the organisation of trainings/workshops: Identification and contact data of journalists, stakeholder organisations, partners, and young people, invited to or participating in the trainings and workshops including name, title, gender, profession, function, e-mail address, phone numbers
- Login credentials in case of online registrations

II. In addition, data are also collected during the contract and processed for documenting the contract and the purpose of informing the public, promoting EU public diplomacy in communications and publications:

- Photos, audio or video filming and web streaming of beneficiaries, speakers, participants or organisers as well as feedbacks, surveys, reports and other information about the event
- Photos taken in workshops, events, trainings, campaign activities, and the data you provide with your photo
- Data provided on the consent forms, such as name, age, organisation, function, e-mail, residence address

Disclaimer:

The organisers waive responsibility of videos/photos taken, shared, published by participants or other individuals, including journalists and other members of the press not contracted by the EEAS/EU Delegations.

III. Data collection by websites: when using online applications, websites may apply dynamic tools such as cookies for technical functioning, gathering statistics and providing a personalised experience for them as users. More information about cookies can be found on the specific websites.

IV. If you give your consent, personal data may be part of a contact list shared internally among EEAS services for the purpose of promoting future EU activities and disseminating information. The privacy statement on [contact lists](#) and [public diplomacy initiatives](#) are also available on the EEAS website.

4. DATA CONTROLLER: Who is entrusted with processing your data?

The data controller determining the purpose and means of the processing is the European External Action Service (EEAS).

The data controller contact entity for each individual event under the supervision of the Head of Delegation is the EU Delegation in Syria, with the assistance of Stantec as data processor, from or on behalf of which you were contacted.

5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

The recipients of your data may be:

- Designated organising staff of the EEAS/EU Delegation to Syria
- Assigned staff of other EU institutions and other assigned organiser team members, if required
- Contractor, Stantec, designing and implementing communication activities on behalf of the EU Delegation to Syria
- Participants, Interpreters, Technical staff if relevant
- General public (if data made public on the internet, the EEAS website or social media platforms)

Data will not be shared with third parties for direct marketing. Under certain conditions outlined in law, we may disclose their information to third parties, (such as the European Anti-Fraud Office, the Court of Auditors, or law enforcement authorities) if it is necessary and proportionate for lawful, specific purposes. Service providers will process data on documented instructions and on behalf of the EEAS/EU Delegation in accordance with Article 29 of Regulation (EU) 2018/1725. Data will not be communicated to third parties, except where necessary for the purposes outlined above.

Social Media

The EEAS and the EU Delegations use social media to promote and inform about events through widely used and contemporary channels. In addition to the [EEAS Webpage](#) or [FPI webpage](#), videos may be uploaded to the [EEAS YouTube](#) channel and links from our website can appear on [Twitter](#), [Instagram](#), [Flickr](#), [LinkedIn](#), [Facebook and Mastodon](#), in addition to the EUD social media accounts' [Facebook](#) and [Twitter](#).

The use of social media does not in any way imply endorsement of them or their privacy policies. We recommend that users read the [Twitter](#), [Flickr](#), [Facebook](#), [Instagram](#), [LinkedIn](#), [Mastodon](#) and [YouTube](#) privacy policies which explain their data processing policy, use of data, users' rights and the way how users can protect their privacy when using these services.

6. ACCESS, RECTIFICATION AND ERASURE OF DATA: What rights do you have?

You have the right of access to your personal data and the right to correct any inaccurate or incomplete personal data. The right of rectification can only apply to factual data processed. Under certain conditions, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. For more detailed legal references, you can find information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent. If you wish to exercise your rights or have questions concerning the processing of your personal data, you may address them to the Data Controller via

EU DELEGATION to Syria
delegation-syria@eeas.europa.eu

7. LEGAL BASIS: On what grounds we collect your data?

Lawfulness of the data processing

The processing of your personal data related to events and communication activities organised by the EU Delegation to Syria, as mandated by the Treaties, specifically by articles 5, 11, 20, 21-40, 42, 43 of the of the Treaty on European Union (TEU) and 2 (4) and (5), 15, 205, 220-221, 326 – 334 of the Treaty on the Functioning of the European Union (TFEU), is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the EEAS [Article 5(1) a of Regulation (EU) 1725/2018 as referred to in Recital 22 thereof].

At the same time, data processing for EU communication activities and publications, if applicable, is based on your consent requested separately [Article 5(1)(d) of Regulation (EU) 2018/1725] for the following:

For the set up and management of the Network of Practitioners (via the EUSurvey):

- Personal data collected via the EUSurvey registration form

For the thematic campaigns:

- photos, video recordings taken on the event or communication activities which may be shared in EU communications (see point 3)

For the organisation of trainings/workshops:

- permanent contact list created and shared internally among EEAS, EUD services, implementing partners, and Stantec for the purpose of promoting EU activities/events and disseminating information.

For data collected by websites:

- placing persistent cookies not technically necessary for the functioning of the website.

If you do not wish for some personal data, including photos, to be published on the web, you also have the option not to provide consent. Participants that choose this option, depending on the type of event and available resources, may be take a seat in non-photographed areas, may follow the event by web streaming or wear an identifier including a colour code on stickers or badges. You can withdraw your consent at any time and you also have the option to give consent only to one or more data processing activities.

Further references:

[Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS \(2010/427/EU\)](#) (OJ L 201, 3/8/2010, p. 30)

Shared Vision, Common Action: A Stronger Europe - [A Global Strategy for the European Union's Foreign and Security Policy](#) of June 2016 as well as Council Conclusions of October 2016 where the Council of the European Union emphasises *"the need of joining up efforts in the field of public diplomacy including strategic communication, inside and outside the EU, to speak with one voice and ultimately promote its core values"*.

8. TIME LIMIT - DATA STORING: For what period and how we process your data?

Our aim is to keep your personal data not longer than necessary for the purposes we collect them. After the event, your data are kept as long as follow-up actions to the event are required. Reports and other material containing personal data are archived according to e-Domec policy.

Personal data related to the Network, the thematic campaigns and the trainings, workshops will be deleted **two years after the last action in relation to the campaigns**.

Your data in permanent contact lists are stored as long as the contact lists are used for communications. You can always request that your data is removed from the contact list and if your address on the contact list is invalid (the notifications sent generate an error message), your data will be removed.

Cookies placed by the websites have their expiration and can be removed using the settings of your browser.

Communication material will be displayed as long as relevant in the context of the campaigns.

Financial data related to the thematic campaign events and other events will be kept for a maximum period of 8 years after the end of the contract for auditing purposes. Sensitive personal data relating to access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the event, but no later than within 1 month after the end of the contract. Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time including the publication on the EU Delegation webpage and EEAS Intranet or EEAS website with appropriate safeguards in place.

Security of data

The EEAS, the EU Delegation and FPI strive to ensure a high level of security for your personal data. Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password. Physical copies are stored in a secured manner. In case a service provider is contracted, as a processor, the collected data may be stored electronically by the external contractor, who has to guarantee data protection and confidentiality required by the Reg. (EU) 2018/1725. These measures also provide a high level of assurance for the confidentiality and integrity of the communication between you [your browser] and the EEAS/EU Delegation. Nevertheless, a residual risk always exists for communication over the internet, including email exchange. The EEAS relies on services provided by other EU institutions, primarily the European Commission, to support the security and performance of the EEAS website.

9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?

If you have enquiries you can also contact the EEAS Data Protection Officer at data-protection@eeas.europa.eu.

10. RECOURSE

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