

Data Protection Notice – Social Media Monitoring/Listening

The management of the services requires the processing of personal data. In accordance with Articles 15 and 16 of Regulation (EU) 2018/1725¹ on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies, EFSA informs on the following:

1. Information on the controller and the data protection officer:

The Head of EFSA's Communications (COM) Unit is the controller of the processing of personal data for the purpose of EFSA's social media monitoring/listening. The controller can be contacted writing to social.media@efsa.europa.eu. For more information on EFSA, please consult our website: https://www.efsa.europa.eu/.

EFSA's data protection officer can be contacted for clarification on the processing of personal data by EFSA, writing to: DataProtectionOfficer@efsa.europa.eu.

EFSA's COM Unit relies on an external service provider to aggregate publicly available data gathered on social media platforms and to prepare social media monitoring analysis reports. The provider is Fenix Media Limited t/a Pulsar ("Pulsar"), a company registered in England and Wales. Pulsar's privacy policy can be found here.

Social media platforms are separate controllers for the personal data they process. Users sign up to social media platforms on a voluntary basis, subject to their respective terms and policies. Usually, before accessing social media platforms, users are prompted to accept or decline these terms and policies. To learn more on how the following social media platforms process personal data, we encourage you to read the privacy policies of:

- Apple Podcasts
- Facebook (Meta)
- Google Podcasts
- <u>Instagram</u>
- LinkedIn
- Mastodon
- Pinterest
- Spotify
- <u>TikTok</u>
- X/Twitter
- YouTube

2. Purpose of the personal data processing:

The purpose of social monitoring/listening by the COM Unit of EFSA is:

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, OJ 21.11.2018, L 295/39.



- (1) to capture and analyse the discourse of institutional partners and stakeholders (Reputational);
- (2) to engage with institutional partners, stakeholders and users (Engagement);
- (3) to map emerging topics of EU citizens' concern in the area of food safety (Concern scanning);
- (4) to analyse the performance of EFSA's content and understand users' needs (Analytics).

3. Legal basis:

The processing is necessary for the performance of a task carried out in the public interest by EFSA as mandated by its Founding Regulation (EC) No 178/2002².

Specifically, according to Article 8b of the Founding Regulation - 'General principles of risk communication' - EFSA must "ensure that accurate and all appropriate information is exchanged in an interactive and timely manner with all interested parties, based on the principles of transparency, openness, and responsiveness", "take account of risk perceptions of all interested parties" and "facilitate understanding and dialogue amongst all interested parties".

4. Categories of data subjects:

The data subjects concerned are users of social media platforms listed in Section 1 who publicly engage in these platforms on topics relevant to EFSA's work, for example by mentioning topics under EFSA's remit, mentioning EFSA itself, by following EFSA's corporate social media channels, or by being a party that belongs to EFSA's stakeholders.

5. Categories of personal data processed:

Depending on the circumstances and on the social media platforms used, the following categories of data may be processed:

- 1) Personal data derived from user profiles, including name and surname, username, user identification, geographical area, age and gender.
- 2) Personal data available about social media platform users through their networks and connections: engagement, reach and sentiment, comments, shares of users on a specific topic, networks and connections.
- 3) Personal data available via audiovisual content that may be published on the social media platforms: content information provided by a user, including metadata, such

Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, OJ L 31, 1.2.2002, p. 1-24 as last amended by means of Regulation (EU) 2019/1381 on the transparency and sustainability of the EU risk assessment in the food chain, OJ L 231, 6.9.2019, p. 1-28.



as the location of a photo or the date a file was created, voice recordings, video recordings, or an image of a data subject.

To note that for analytical and monitoring purposes, EFSA only uses aggregated statistical data such as the numbers of followers and interactions (likes, comments, shares), etc.

To protect users' privacy, EFSA social media buttons to connect to those services do not set cookies when our website pages are loaded on your device and you are not immediately redirected to social media platforms or other websites.

In addition, EFSA's social media monitoring activity may specifically cover all types of personalised information broadly related to food consumption and food safety, posted or otherwise rendered public in social media platforms. This may extend to users' sensitive health-related data or philosophical concepts or ideas.

On behalf of EFSA, the Pulsar service provider scrapes, crawls and otherwise collect information from EFSA's social media accounts to use, process and analyse and display it in reports provided to EFSA.

6. Recipients of personal data:

Pulsar reporting is accessible to a limited number of COM Unit staff members in charge, who have personalised user accounts in the system for this purpose.

7. What are your rights as a data subject in relation to data collected and processed on you?

As a data subject, you can exercise your right of access, rectification or erasure of your personal data, by writing to the Data Controller at the following address social.media@efsa.europa.eu.

8. Retention period of personal data:

EFSA aims at detecting trends in communication campaigns and public perception over time. EFSA therefore retains public data in aggregate format as long as needed for this purpose and maximum for 10 years. The data will not be used for any unrelated purpose. Instead, analysis data on social media users in the EFSA account of the Pulsar support system are kept for maximum 2 years, after which they are securely and automatically deleted in accordance with the relevant privacy policy of the platform (see point 1).

9. Right to lodge a complaint:

Data subjects have the right to lodge a complaint on the processing of their personal data in the context of the social media monitoring/listening activities by the Com Unit of EFSA with the European Data Protection Supervisor – <u>EDPS complaints form</u>.