



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title
Social media monitoring/listening

1) Controller(s) ¹ of data processing activity (Article 31.1(a))
EFSA unit in charge of the processing activity: COM Unit / COMCO Department
EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu
Is EFSA a co-controller? No
If yes , indicate who is EFSA's co-controller:

2) Who is actually conducting the processing? (Article 31.1(a))
The data is processed by EFSA itself <input type="checkbox"/>
<i>Indicate the EFSA units or teams involved in the data processing:</i>
COMCO department of EFSA
The processing operation is conducted together with an external party X
<i>Please provide below details on the external involvement:</i>
COM Unit relies on an external service provider to prepare social media monitoring analysis reports, which currently is Fenix Media Limited t/a Pulsar, a company registered in England and Wales with company number 04378213 and registered office at The Johnson Building, 79 Hatton Garden, London EC1N 8AW, United Kingdom ("Pulsar").

3) Purpose of the processing (Article 31.1(b))
The objectives of EFSA social media monitoring are: (i) to capture and analyse the discourse of institutional partners and stakeholders (Reputational); (ii) to map emerging topics of EU citizens' concern in the area of food safety (Concern scanning); (iii) to interact and use EFSA content and related topics (Analytics)

¹ The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):

Processing necessary for:

- (a) a task carried out in the public interest or in the exercise of official authority vested in EFSA ☒
- (b) compliance with a legal obligation to which EFSA is subject ☐
- (c) performance of a contract with the data subject or to prepare such contract ☐
- (d) The data subject has given consent (ex ante, explicit, informed) ☐

Further details on the legal basis:

The "Transparency Regulation" (EU) 2019/1381 amends EFSA's Founding Regulation (EC) No 178/2002, inter alia inserting a new Article 8b - 'General principles of risk communication', which contains the following points: "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" as well as "take account of risk perceptions of all interested parties."

The overall objective is EFSA to support the European Commission to develop a risk communication plan for which the Commission is in charge.

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

- EFSA statutory staff ☒
- Other individuals working for EFSA (consultants, trainees, interims, experts) ☒
- Stakeholders of EFSA, including Member State representatives ☒
- Contractors of EFSA providing goods and services ☐
- The general public, including visitors, correspondents, enquirers ☒
- Relatives of the data subject ☐
- Other categories of data subjects (please detail below) ☐

Further details concerning the data subjects whose data are processed:

The data subjects concerned are users of social media platforms (such as Twitter, Facebook, and similar) who engage in 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.

For the purpose of accessing the Pulsar platform, personal data of EFSA statutory staff and other individuals working for EFSA are processed (surname, name, email address).

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

- | | |
|---|-------------------------------------|
| Name, contact details and affiliation | <input checked="" type="checkbox"/> |
| Details on education, expertise, profession of the person | <input type="checkbox"/> |
| Curriculum vitae | <input type="checkbox"/> |
| Financial details | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input checked="" type="checkbox"/> |
| Goods and services the person provides | <input type="checkbox"/> |
| Other personal data (please detail): | <input checked="" type="checkbox"/> |

b) Sensitive personal data (Article 10)

The personal data reveals:

- | | |
|---|-------------------------------------|
| Racial or ethnic origin of the person | <input type="checkbox"/> |
| Political opinions or trade union membership | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input checked="" type="checkbox"/> |
| Health data or genetic or biometric data | <input checked="" type="checkbox"/> |
| Information regarding the person's sex life or sexual orientation | <input type="checkbox"/> |

Further details concerning the personal data processed:

The social media monitoring activity may cover all types of personalized information broadly related to food consumption and food safety, which social media users post or otherwise render public in social media platforms. This may extend to their 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 analyze and display it in reports provided to EFSA.

7) Recipients of the data (Article 31.1(d))

- | | |
|---|-------------------------------------|
| Line managers of the data subject | <input type="checkbox"/> |
| Designated EFSA staff members | <input checked="" type="checkbox"/> |
| Other recipients (<i>please specify</i>): | <input type="checkbox"/> |

Data are accessed and analyzed by staff members in the COMCO department. Access to the data is granted on a need to know basis. Access to the Pulsar platform is given only to staff members directly involved in the project, requiring username and password.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes ☒ No ☐

If yes, specify to which third country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission	<input checked="" type="checkbox"/>
Standard Contractual Clauses	<input checked="" type="checkbox"/>
Binding Corporate Rules	<input type="checkbox"/>
Memorandum of Understanding between public authorities	<input type="checkbox"/>

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

On EFSA's Document Management System (DMS)	<input checked="" type="checkbox"/>
On a shared EFSA network drive or in an Outlook folder	<input type="checkbox"/>
In a paper file	<input type="checkbox"/>
Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)	<input checked="" type="checkbox"/>
On servers of an external service provider	<input checked="" type="checkbox"/>
On servers of the European Commission or of another EU Institution	<input type="checkbox"/>
In another way (<i>please specify</i>):	<input type="checkbox"/>

Please provide some general information on the security measures applied:

Pulsar provides the services using a SaaS cloud solution. Schedule 2 to the Terms of Service concluded with Pulsar details that EFSA data are stored in Pulsar's AWS cloud facility, located in Ireland.

The data are accessed via a secure interface on the Pulsar website, which requires each COMCO staff member to authenticate. Reports of the data are stored on secure EFSA file systems (DMS, SharePoint).

10) Retention period (Article 4.1 (e))

Data will be retained for 5 years. It is necessary to retain the data for this period for the purpose of data analysis, to allow comparison of present data with data from earlier periods, and to monitor communication campaigns over their lifetime.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes ☒ No ☐

If yes, please provide some details on the consultation with the ISO:

The ISO has been consulted in the context of the SaaS questionnaire which service provider Pulsar has completed and submitted to EFSA.

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

As part of broader advice concerning the project and tool and besides the drafting and publication of the present record, the DPO made the following recommendation:

COM Unit to insert an information note on EFSA's social media monitoring activity in the EFSA corporate social media accounts (Twitter, LinkedIn, YouTube channel) and also on the EFSA website (legal/data protection note)

Last update of this record: 23/10/2020

Reference: DPO/COM/5