



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
Subscription to EFSA newsletters and Communication products distributed by email
1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity: Communication, Engagement and Cooperation Department (COMCO).</p> <p>EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu</p> <p>Is EFSA a co-controller? No</p> <p>If yes, indicate who is EFSA's co-controller:</p>
2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself <input type="checkbox"/></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>The processing operation is conducted together with an external party <input checked="" type="checkbox"/></p> <p><i>Please provide below details on the external involvement:</i></p> <p>For the management of subscriptions to its newsletter and Communication products, EFSA relies on its EFSA's Relationship Management system 'Connect.EFSA' based on the cloud-based (SaaS) platform provided by https://www.salesforce.com/ CRM software. (more details in point 9 below).</p>
3) Purpose of the processing (Article 31.1(b))
<p>The purposes of EFSA newsletters and Communications products distribution and the related collection and further processing of personal data are:</p> <p>(1) For subscribers: to receive periodically via email the EFSA Highlights Monthly Newsletter, the EFSA Thematic News and/or EFSA Public Consultation Notifications;</p> <p>(2) For EFSA: a means of communicating to the general public on its activities in the field of food and feed safety in accordance with its mandate.</p>
4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):

<i>Processing necessary for:</i>	
(a) a task carried out in the public interest or in the exercise of official authority vested in EFSA	<input checked="" type="checkbox"/>
(b) compliance with a legal obligation to which EFSA is subject	<input type="checkbox"/>
(c) performance of a contract with the data subject or to prepare such contract	<input type="checkbox"/>
(d) The data subject has given consent (ex ante, explicit, informed)	<input checked="" type="checkbox"/>
<i>Further details on the legal basis:</i>	
<p>The EFSA communication activities form part of the tasks carried out in the public interest and for the management and functioning of EFSA as mandated by its Founding Regulation (EC) No 178/2002, in Article 23 and Article 40 thereof.</p> <p>The subscriptions entail the processing of a limited number of personal data based on the data subject's consent in accordance with Article 5(1)(d) of Regulation (EU) 2018/1725, with the aim of providing the service. The subscriber can opt-in to the following selections:</p> <ul style="list-style-type: none"> • The subscription type: EFSA Highlights Monthly Newsletter, EFSA Thematic News, Public Consultations Notifications and provision of consent by means of a tickbox for the processing of personal data to allow the subscription, • Provision of consent by means of a tickbox for receiving invitations to events related to the subscription(s) opted for, • Provision of consent by means of a tickbox for data use to perform aggregated statistical analysis for optimising the service provision. <p>The data subject's consent and subscription is registered and confirmed following a two-step validation process.</p>	

5) Description of the categories of data subjects (Article 31.1(c))	
<i>Whose personal data are processed?</i>	
EFSA statutory staff	<input checked="" type="checkbox"/>
Other individuals working for EFSA (consultants, trainees, interims, experts)	<input type="checkbox"/>
Stakeholders of EFSA, including Member State representatives	<input type="checkbox"/>
Contractors of EFSA providing goods and services	<input type="checkbox"/>
The general public, including visitors, correspondents, enquirers	<input checked="" type="checkbox"/>
Relatives of the data subject	<input type="checkbox"/>
Other categories of data subjects (please detail below)	<input type="checkbox"/>
<i>Further details concerning the data subjects whose data are processed:</i>	
<p>Any person with a valid email address can subscribe to EFSA newsletters and Communications products.</p>	

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 checked="" type="checkbox"/> |
| Curriculum vitae | <input type="checkbox"/> |
| Financial details | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input type="checkbox"/> |
| Goods and services the person provides | <input type="checkbox"/> |
| Other personal data (please detail): | <input 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 type="checkbox"/> |
| Health data or genetic or biometric data | <input type="checkbox"/> |
| Information regarding the person's sex life or sexual orientation | <input type="checkbox"/> |

Further details concerning the personal data processed:

- The subscriber's name and email address inserted in the subscription form,
- Optionally and only when the data subject provided consent, the area of professional occupation for targeting audience purposes,
- Only when the data subject provided consent, their 'Service Usage Data' which may include device information, logging data and usage data for Salesforce's technical and operational management purposes. EFSA collects through the Salesforce CRM system usage data on subscribers, allowing to measure the user satisfaction about EFSA's communication products and to identify possible improvements. The system allows a high-level profiling of subscribers in the sense of Article 15(2)(f) of Regulation (EU) 2018/1725, helping EFSA to identify segments of its audiences based on their engagement level with our communication products distributed by email.

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 checked="" type="checkbox"/>
<ul style="list-style-type: none"> • EFSA staff in charge of the administration of the subscriptions based on the Salesforce CRM service provision, • Salesforce as EFSA's service provider and its sub-contractors, authorised to use such data for the sole purpose of the performance, management and follow-up of the contract in accordance with applicable data protection laws 	

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

The management of subscriptions to EFSA's newsletters and Communication products is supported by EFSA's Relationship Management system 'Connect.EFSA' based on the cloud-based (SaaS) platform provided by <https://www.salesforce.com/> CRM software. The use of this tool may entail the transfer of personal data outside the European Union, by Salesforce, its affiliates or its sub-processors. A '[Data Processing Addendum](#)' (DPA) forms part of EFSA's subscription to the Salesforce CRM (see below point 9), providing for 'Standard Contractual Clauses' as an Annex to it. The Salesforce DPA with SCC annex is considered to provide an appropriate safeguard for the data transfers in accordance with Article 48(2)(b) of Regulation (EU) 2018/1725.

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

How is the data stored?

On EFSA's Document Management System (DMS)	<input 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)

On servers of an external service provider

On servers of the European Commission or of another EU Institution

In another way (*please specify*):

Please provide some general information on the security measures applied:

The management of subscriptions to EFSA's newsletters and Communication products is supported by EFSA's Relationship Management system 'Connect.EFSA' based on the cloud-based (SaaS) platform provided by <https://www.salesforce.com/> CRM software. A data protection compliance check was carried out based on the contract documents of the Salesforce service provider. Overall, the Salesforce contract terms and conditions show a good level of compliance with data protection rules and principles (GDPR). Also a Security Plan on Salesforce is available.

Salesforce data centres for storage of EFSA data are located in Germany and France. There are no systematic data transfers outside the European Economic Area.

10) Retention period (Article 4.1 (e))

All personal data is retained for as long as the data subject is subscribed, receiving periodically per email the products subscribed to via the 'EFSA.Connect' CRM system. A self-service feature contained in each email delivery allows subscribers at any time to edit their subscription or to unsubscribe.

In addition, on periodical intervals an email to all users included in the mailing list of the 'EFSA.Connect' CRM system is generated, asking to confirm their contact details. Subscriptions will be cancelled if recipients do not react to such invitation to confirm, update or rectify their contact details.

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 on the Salesforce CRM tool *inter alia* supporting the subscription to EFSA Newsletters and related products and a Security Plan on Salesforce is available.

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.

A general privacy statement on the 'Connect.EFSA' CRM tool is available in the entry point to the tool on the EFSA website - <https://connect.efsa.europa.eu/RM/s/termofuse>

A specific privacy statement concerning the newsletter subscription service will be added (pending).

Last update of this record: 03/08/2021

Reference: DPO/COM/6