



PROTECTION OF YOUR PERSONAL DATA

**This privacy statement provides information about
the processing and the protection of your personal data**

Processing operation: European Climate Pact activities delivered by the European Commission and appointed contractors and sub-contractors.

Data Controller: Directorate-General for Climate Action,
Unit A.3
CLIMA-EUROPEAN-CLIMATE-PACT@ec.europa.eu.

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1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reasons for the processing of your personal data, the way we collect, handle, and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

This privacy statement concerns the processing of personal data by the Commission when managing its activities related to the launch of European Climate Pact, administered by the Directorate-General for Climate Action, Unit A.3. (CLIMA.A.3) and by the units responsible for dealing with processing activities related to the said initiatives in the competent Commission department or service, in particular in relation to third parties acting as “Ambassadors” for the Pact.

2. Purpose of the processing operation

Personal data under this Privacy Statement is only collected and processed for the purposes of the European Climate Pact activities, organised by the Commission and shall not be used for any other purposes.

For Debating Europe online discussions, any personal data is processed under the exclusive controllership of Friends of Europe and only aggregated and anonymised data will be communicated to DG CLIMA, authorised personnel of the EU institutions and to approved contractors and partners linked to the European Climate Pact (information can be found in Heading 7). Personal data which is provided in the public comments section on the website will be discarded as it is neither requested nor necessary for the purpose of the activity.

Further information on these processing activities can be found in the table in Heading 4.

3. What is the legal basis for processing your data?

The lawfulness of the processing of your personal data can be based on Article 5.1(a) (public interest task) or on Article 5.1(d) (your consent), depending on the European Climate Pact activities you are involved in. Please find the legal basis that applies for each processing activity listed in the table in Heading 4 below.

4. What personal information do we collect, for what purpose and through which technical means?

The personal data that we collect from you (or which we may have about you due to previous communications and/or other activities under the European Climate Pact) and process for purposes of the European Climate Pact will depend on the activities you are participating in.

In this specific instance, the activity and personal data involves:

Purpose of Processing	Categories of Personal Data	Data Subject(s) & source of data	Legal basis
Collating views and comments made by individuals participating in a Debating Europe online discussion on	Name (format is free) e-mail address	Anyone (open page with free comments) Source: Data subjects	Consent N.B. through the comment function, your email will remain private and will not be

Purpose of Processing	Categories of Personal Data	Data Subject(s) & source of data	Legal basis
the Friends of Europe Website, an activity carried out in the context of the Climate Pact.			accessible to nor shared with other parties than those you share them with.
Collecting information about users on the Friends of Europe website (external to the Climate Pact). A cookies policy from Friends of Europe is available here . The privacy statement for the Citizen Debate site is also available for consultation here .	Cookie	All Friends of Europe Citizen Debate website's users	Consent for non-functional cookies.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing as described above.

5.1 Personal data derived from registering to place a comment on a Debating Europe discussion (name and email address)

After initially being processed by the Data Controller or its processors, personal data may be stored for a maximum period of 5 (five) years or until the Climate Pact project ceases to exist.

Please be advised that the retention period is only an estimate and, it may vary depending on the nature of the data, why it is collected and processed, and relevant retention requirements prescribed by law.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails) are either on the servers of the European Commission (located on the premises of the Directorate-General in Brussels and in the DG DIGIT datacentre in Luxembourg), or of its contractors, all inside the EU. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the Commission.

The Commission's contractors are bound by specific contractual clauses for processing operations of personal data on behalf of the Commission and by the confidentiality obligations deriving from the Regulation (EU) 2018/1725.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data, to whom is it disclosed and who will process personal data?

Access to your personal data is provided to authorised personnel of the EU institutions and to approved contractors and partners linked to the European Climate Pact. These parties are responsible for carrying out processing operation based on a "need to know" principle. Such staff

abide by statutory, and when required, additional confidentiality agreements.

The contractors for this processing are:

- ICF, Belgium
- Friends of Europe, Belgium

We use social media (Twitter, Facebook, Instagram, LinkedIn) to inform about and promote the network and activities of Friends of Europe in the context of the Climate Pact. These social media may use cookies that collect your personal data in the event that you click on the social media link. The Data Controller has no control or responsibility on these third-party cookies. Therefore, we recommend you read these social media privacy policies before clicking on these social media links.

The controller may transfer your personal data to recipients in a third country or to an international organisation in accordance with Regulation (EU) 2018/1725.

The controller will transfer your personal data based on:

- an adequacy decision of the Commission for a specific country / commercial sector (Article 47 of Regulation (EU) 2018/1725), and
- in the absence of an adequacy decision appropriate safeguards (Article 48 of Regulation (EU) 2018/1725), such as standard contractual clauses that can be obtained by sending an email to the controller.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to other third party, except to the extent and for the purpose we may be required to do so by law, including the possible transmission of personal data to EU bodies or institutions in charge of audit or inspection in accordance with the EU Treaties.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725. As regards this processing operation, you can exercise the following rights:

- the right to access your personal data (Article 17 of Regulation (EU) 2018/1725);
- the right to rectification in the case that your personal data is inaccurate or incomplete (Article 18 of Regulation (EU) 2018/1725);
- the right to erasure of your personal data (Article 19 of Regulation (EU) 2018/1725) where their processing is based on your consent or if your objection to their processing was successful;
- where applicable, the right to restrict the processing of your personal data (Article 20 of Regulation (EU) 2018/1725);
- the right to data portability (Article 22 of Regulation (EU) 2018/1725);
- and the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

You can exercise your rights by contacting the Data Controller, or in case of conflict, the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. The contact information can be found under Section 7.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description, i.e. Record reference in your request.

9. Contact information

The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, Directorate-General for Climate Action, Unit A.3, at CLIMA-EUROPEAN-CLIMATE-PACT@ec.europa.eu.

The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller. (edps@edps.europa.eu)

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-09866.