

RECORD OF PROCESSING OPERATION¹ ON Client Relations Management (CRM)

Nr.	Item	Description
1.0	Last update of this record	26.10.2020
1.1	Reference number	DP.COM.18.3_CRM
1.2	Name and contact details of controller	European Environment Agency (EEA) Kongens Nytorv 6, 1050 Copenhagen K, Denmark Communication Programme, Stakeholder Relations expert subscriptions@eea.europa.eu
1.3	Name and contact details of joint controller(s) (where applicable)	N/A
1.4	Name and contact details of the processor (where applicable)	Marco De Communication
1.5	Name and contact details of the DPO	DPO@eea.europa.eu
1.6	Purpose of the processing	<p>The purpose of the processing operation is to allow EEA staff access to contact information about EEA stakeholders and clients who have requested EEA's information, in order to pro-actively reach a targeted audience for EEA products, information and services.</p> <p>The CRM is used to extract targeted dissemination lists for EEA information and products, including printed reports, electronic notifications and newsletters.</p> <p>Click through rates are monitored and collected for statistical purposes.</p>
1.7	Description of categories of persons whose data the EEA processes and list of data categories	<p>The personal data collected and processed refers to any person interested in receiving information from the EEA.</p> <p>The categories of data collected and used for the processing operations are the following:</p> <ul style="list-style-type: none"> - The e-mail address of the subscriber; - Optionally, first name and surname of the subscriber, information about the organisation to which he/she belongs (name, type of organisation), and areas of interest (environmental themes). <p>The data are encoded directly by the subscriber in</p>

¹ Record of EEA activities processing personal data, based on Article 31 of 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.

		<p>the online sign-up form.</p> <p>IP address and city location information are collected by the CRM only in case the subscriber has clicked to allow “tracking”. During the sign-up process, the subscriber can decide whether the “tracking” option is allowed. Subscribers may at any time disable the tracking function via the “preference centre”. In case tracking is not enabled, the EEA only collect email address and do not collect any other personal data including IP address and city location.</p>
1.8	Time limit for keeping the data	<p>The data entered will be retained only as long as the subscriber wishes to maintain his or her subscription.</p> <p>In case the subscriber wishes to permanently erase his/her data, a request may be addressed to subscriptions@eea.europa.eu. It may take up to 60 calendar days to erase all traces of such personal data.</p> <p>Aggregated and anonymous data on the number of subscribers over time, distribution of areas of interest and the click through rates are retained for statistical purposes.</p>
1.9	Recipients of the data	<p>The data is disclosed to a limited number of EEA staff members in the Communication programme responsible for the dissemination of material or information, as well as EEA staff members responsible for the mailing of thematic newsletters and the organisation of meetings, workshops, conference, events, etc.</p> <p>In cases where the EU Publications Office on behalf of the EEA disseminates printed publication, a mailing list is extracted from the CRM and sent to the Publications Office.</p> <p>The service provider for contact database and dissemination has also access to the data when requested by the EEA to carry out necessary adjustments or maintenance.</p>
1.10	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>For the purposes of CRM and dissemination services, an online tool, Campaign Monitor, is used. The company offering the tool is based in Australia, and therefore data is transferred to a third country. The company has sub-processors that may be used for security purposes and some of them are based in the US. All processing that takes place in this context is governed by a Data Protection Addendum, which contains Standard Contractual Clauses, authorized under Commission Decision C(2010)593. Currently, this is the list of sub-processors:</p> <p>Security:</p> <ul style="list-style-type: none"> ○ Splunk (Security Monitoring) <p>App Functionality Vendors</p> <ul style="list-style-type: none"> ○ Amazon Web Services (Software Infrastructure) ○ ExaVault (Customer File SFTP) ○ Gravatar (Email-based subscriber avatar) ○ Litmus (Email Testing)

		<ul style="list-style-type: none"> o Email on Acid (Email Testing) o Beaufort12 (CM4SFDC provisioning) o Google Analytics User Support/Communication o TalkDesk (Support ticketing software) o Salesforce (Customer support case tracking) o Citrix SendFile (Secure File Sharing) o Dropbox (File Sharing) <p>Internal Tools</p> <ul style="list-style-type: none"> o Google G Suite (Internal Communication/Collaboration) o Slack (Internal Communication/Collaboration) <p>In case other sub-processors are to be used by Campaign Monitor, the EEA will be informed by email and has the possibility to object to such sub-processing.</p>
1.11	General description of security measures (where possible)	<p>In order to protect the subscriber’s personal data, a number of technical and organisational measures have been put in place. 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 data being processed. Organisational measures include restricting access to the data to authorised persons with a legitimate need to know for the purpose of the processing operation.</p> <p>The login form and self-service user interface for managing subscriptions implements HTTPS.</p>
1.12	Measures for providing additional information, including how data subjects may exercise their rights of access, rectification, data portability (where applicable), etc.	<p>Additional information is displayed in the relevant Data Protection pages on the EEA website (https://www.eea.europa.eu/about-us/dataprotection/how-to-exercise-your-data) and in the specific privacy statement available on the EEA website (https://www.eea.europa.eu/subscription/targetedsublication)</p>