

DATA PROTECTION NOTICE – Social media monitoring (reference number 26)

Social media monitoring involves processing of personal data, which shall comply with Regulation (EU) N° 2018/1725¹ (the “Regulation”).

This data protection notice explains how the SESAR JU (here after referred to as SJU) uses any information you give to us, and the way we protect your privacy. Furthermore, it describes the rights you have as a data subject and how you can exercise these rights.

SESAR JU protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data.

We provide the following information based on Article 15 of the Regulation.

What is the purpose of the processing?

- The SJU monitors social media in order to understand how the SJU is discussed and perceived in social media so that we can take into account the needs of the general public in our communications. To this end, like other public institutions, we analyse social media activity related to our tasks and monitor the use of our own social media channels. The conclusions drawn from this processing help shape the SJU’s reputation, communication strategy and a more effective and efficient public communication.

Which personal data do we process?

The external provider collects and analyses data from public posts by social media users on different social media channels. The external provider only processes information displayed by the very same data subject.

The external provider may process the following personal data on our behalf:

- identification data (name, username, user identification and geographical area)
- personal characteristics (age, gender and family status)
- consumer habits
- hobbies and interests
- professional and educational background
- photos and videos
- any other information published on a website that is analysed or on a third-party platform.
- Individual quotes may be captured (as examples and used to describe the general attitude towards the SJU in social media).

¹ Regulation (EU) N° 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 (“EUDPR”).



Why do we process your personal data and under what legal basis?

This processing activity is based on article 5(a) Regulation 2018/1725 and is necessary for the management and functioning of the SJU. More specifically, it falls within the SJU mandate as illustrated in the Social Media policy of 22 October 2018 adopted by the Executive Director.

Who is the controller and other actors involved in the processing?

Controller: The SESAR JU, legally represented by Florian Guillemet, Avenue Cortenbergh 100, 1000 Brussels. The responsible unit for the processing activity is the External Relations Communication & Global Outreach team.

Processor: The external service provider EU-Turn <https://eu-turn.com/> through Talkwalker <https://www.talkwalker.com/>

How is SESAR JU processing the personal data?

The external provider collects and analyses data from public posts by social media users on different social media channels, and tracks different online sources including fora, blogs and online news websites (Web server, Twitter, Youtube, Mobile App, LinkedIn). The external provider only processes information that is publicly available.

While the processor may collect data of some of the categories listed above, the SJU only analyses some of these data, mostly aggregate in the form of a daily and annual report provided by the processor. Individual quotes may be captured as examples and used to describe the general attitude towards the SJU in social media, however, these quotes will be limited to those of individuals who publish posts about the SJU in their professional capacity or those of influencers.

See <https://www.sesarju.eu/dataprotection> for more information.

How do we protect and safeguard your information?

The SJU has set up strict limitations on the topics to monitor and have ensured that our staff, when accessing and using the external provider's database, are bound by clear instructions and confidentiality obligations in social media guidelines for all Staff.

The daily and annual report is safely stored in restricted areas locally at the premises of the SJU.

Who can access your personal data and to whom is it disclosed?

Members of the External Relations Communication & Global Outreach team and the Executive Director have access only to the aggregated reports

EU-Turn on the terms described in the FW service contract SJU/LC/0352-CRT Lot 1 on Strategic communications and its subcontractor Talkwalker.



What are your rights and how can you exercise them?

You have the right of access to your personal data and to relevant information concerning how we use it. You have the right to rectify your personal data. Under certain conditions, you have the right to ask that we delete your personal data or restrict its use. You have the right to object to our processing of your personal data, on grounds relating to your particular situation, at any time. In addition, you have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on him or her, except for certain situations, such as entering into a contract (as required by articles 14-16 & 24 of the Regulation).

Information on action taken on the data subject's request to exercise her/his rights shall be provided without undue delay and in any case within one month of receipt of the request. In case of complex or voluminous requests, this period may be extended by another two months, in which case the JU will inform the data subject.

Data subjects have the **right to withdraw their consent** at any time by sending a written request to communications@sesarju.eu. Please note that withdrawing your consent does not affect the lawfulness of any processing based on your consent before this consent is withdrawn.

Possible restrictions as laid down in Article 25 of the Regulation and the upcoming SJU decision on restrictions may apply.

How long is the data retained?

- Reports containing personal data will be stored for a maximum of five years and will then be destroyed/deleted. Upon the instructions of the SESAR JU, the external provider will delete the results of searches after a period of six months. Automatic backups will also be deleted from the provider's servers after six months.

Complaints, concerns and recourse

Should you have any complaint or concern you may contact:

- the Data Protection Officer of the SESAR JU at sju.data-protection@sesarju.eu, and
- the External Relations Communication & Global Outreach team: communications@sesarju.eu
- In addition, as a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time by e-mail to edps@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO:

European Data Protection Supervisor, Rue Wiertz 60, B-1047 Brussels, Belgium

For more information on the EDPS, please consult their website: <https://edps.europa.eu>

Additional information

More information on Data Protection at the SESAR JU can be obtained in the [SJU register of data processing operations](#) and in the privacy notice published in the [SESAR JU web site](#).