



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** Processing of personal data within the Better Internet for Kids (BIK) Community area, including the BIK Youth Closed Area (hereinafter “the community”).

**Data Controller:** European Commission, Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet.

**Data Processor:** EUN partnership aisbl (hereinafter “European Schoolnet”), Rue de Trèves, 61 (3rd floor), 1040 Brussels, Belgium.

**Record reference:** DPR-EC-09707.1

### **Table of Contents**

- 1. Introduction**
- 2. Why and how do we process your personal data?**
- 3. On what legal ground(s) do we process your personal data?**
- 4. Which personal data do we collect and further process?**
- 5. How long do we keep your personal data?**
- 6. How do we protect and safeguard your personal data?**
- 7. Who has access to your personal data and to whom is it disclosed?**
- 8. What are your rights and how can you exercise them?**
- 9. Contact information**
- 10. Where to find more detailed information?**

## **1. Introduction**

This privacy statement concerns the data processing activities related to the Better Internet for Kids Community, including its Youth Closed Area, both administrated by EUN Partnership (hereinafter “European Schoolnet” or “the data processor/contractor”) on behalf of the European Commission’s Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet of the Commission (“the data controller”).

It explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data. The European institutions and European Schoolnet are committed to protecting and respecting your privacy. As this service collects and further processes personal data, specific data protection rules apply<sup>1</sup>.

## **2. Why and how do we process your personal data?**

Purpose of the processing operation: We collect and use your personal information to administer the community managed by European Schoolnet on behalf of the European Commission’s Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet of the Commission. Collecting and using your data enables us to establish your membership within the community, to contact you with regard to online and offline activities relating to the community and ensure your participation therein, and to have an overview of the various types of members of the community.

Please note that the Better Internet for Kids (BIK) Core Service Platform, is composed of the *BIK Portal*, which is public and the *BIK Community* which is the private sign-in area for registered users. This statement covers the BIK Community and its Youth Closed Area only. For further information on the processing of your personal data on the BIK Portal please refer to the Data Privacy Statement for the BIK Portal and its minisites (DPR-EC-09706.1 for CNECT External Websites).

The BIK *Youth Closed Area* is a part of the BIK Community that provides a secure, moderated space for youth participation and interactions via its own separate child-friendly tools and resources. The Youth Closed Area is accessible only to a very restricted number of youth users following an invitation from European Schoolnet and the completion of a distinct registration process granting special user rights.

The processing operations on personal data for the organisation and management of the community are lawful under Article 5(d) of Regulation (EU) 2018/1725, as the user provides his/her consent before becoming a member.

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<sup>1</sup> Regulation 2018/1725 of the European Parliament and of the Council 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.

### **3. On what legal ground(s) do we process your personal data**

The processing operations on personal data for the organisation and management of the community are lawful under Article 5(d) of Regulation (EU) 2018/1725, as the user provides his/her consent before becoming a member.

We have obtained your consent directly from you. You have expressed it by accepting terms and conditions during your registration process to the community. You may withdraw your consent at any time, in which case please see contact details provided in Section 9.

### **4. Which personal data do we collect and further process?**

We process personal data necessary for the creation of your account on the website, which allows you to participate in the community, and for the organisation and management of the community.

To access the community, you must create an account, which requires the collection of certain personal data such as your first name, last name and e-mail. These data become part of your user account.

#### **For the standard BIK Community (i.e. excluding the BIK Youth Closed Area):**

Other mandatory fields to be provided when you join the community:

- Salutation
- Country

**Optional fields** you can fill in when completing your profile include, in particular:

- Picture
- Free text profile description
- Phone number (landline and mobile)
- Personal website
- Mother tongue
- Other spoken languages
- Organisation's region
- Organisation type
- Organisation address
- Function/Job title

#### **For the BIK Youth Closed Area:**

No additional information is collected as part of mandatory or optional fields aside of first name, last name and e-mail.

Registered users of the community can in any case provide additional information whilst using the platform services, some of which may contain personal data within:

- Articles

- Free text fields and comments
- Pictures, text files
- Links, e.g. to videos

Please note that the Commission does not request nor expect participants to the community to include (i) special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) or (ii) personal data related to criminal convictions and offences as provided for in Article 11 of Regulation 2018/1725, related to themselves or to third persons in their contributions to the community. Should participants nevertheless volunteer such special categories of personal data, these would be processed on the basis of Article 10(2)(a), that is to say explicit consent of the data subjects. The moderator might decide to delete such personal data on the basis of a case-by-case assessment.

Additionally, the system administrator receives your Internet Protocol address (IP address), and the time of log-in. To improve your experience as a user of our website and provide you with a more personalised service without having to ask you repeatedly for your user preferences, we store a limited number of settings through the use of cookies, including:

- Session ID
- Language

Finally, so as to understand how visitors use and engage with the BIK Community, we collect information anonymously and report website trends without identifying individual users through the use of web analytics softwares.

#### **5. How long do we keep your personal data?**

We keep your personal data pertaining to you as a community user (all personal data that is mandatory to create an account) for as long as the support service is provided to you and this data will be retained for 5 years after your last date of login.

We keep your personal data pertaining to the community services (such as posted content) for 5 years after your last date of login.

Your personal data will be deleted from the platform before the end of the five-year retention period, upon request (see contact information in Section 9).

In addition, server access log files where IP addresses are recorded are kept only for 2 weeks.

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

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of European Schoolnet on behalf of the Commission. All processing operations are carried out pursuant to [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the Commission.

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 the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Commission's processors (contractors), including European Schoolnet are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. Each processor has to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

## **7. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the European Schoolnet and Commission staff dealing with this processing operation and to authorised staff according to the "need to know" principle.

Furthermore, access to your personal data can be provided to other external contractors working on behalf of and under contractual agreement with European Schoolnet or the Commission service owning the websites and engaged in creation, maintenance, management, and archiving of websites according to the "need to know" principle.

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

Your data is visible to the other members of the community users. They can see:

- Your profile information, including your picture, first name and last name.
- The content you upload and share (e.g. your posts, documents you upload).

## **Cookies**

Cookies are short text files stored on a user's device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookie).

The cookie-related information is not used to identify data subjects personally. Cookies are not used for any purpose other than those described in this privacy statement. Further information on how to control and/or delete cookies is provided in Section 8.

## **Third Party IT tools – Web Analytics Softwares**

Matomo is currently used to collect information anonymously in order to understand how visitors use and engage with the BIK Core Service Platform, as well as report website trends without identifying individual visitors.

Matomo is an open-source web analytics software installed on European Schoolnet servers so as to ensure a visitor's online behaviour is not shared with advertising companies or other third parties. It is possible to opt out of Matomo.

### **Third Party IT tools – Access to External Content and Tools (e.g. Social Media)**

Additionally, via content available within the community (e.g. content posted by other users including users part of the European Schoolnet staff), you may be able to watch videos, which may be uploaded on social media pages or follow links from the community to other relevant social media.

The use of third-party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button/link or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons/link or videos, no cookies will be installed on your device by third parties.

If, as a user, you decide to view such third-party content, we recommend that you carefully read the relevant privacy policies of the social media tools used. These explain each company’s policy of personal data collection and further processing, their use of data, users’ rights and the ways in which users can protect their privacy when using those services. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

The use of a third-party IT tool does not in any way imply that the European Commission or European Schoolnet endorse them or their privacy policies. In the event that one or more third-party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

Furthermore, opt-in mechanisms or links to forms linked to event registrations, information and e-newsletter subscriptions or online surveys may be made available on the community. If those are events, information subscriptions and surveys managed by European Schoolnet on behalf of the Commission or by the Commission, please note that these processing activities are covered by different data protection records and privacy statements; DPR-EC-01063.1 on Processing of personal data linked to meetings and events, DPR-EC-03928.1 on the Management of subscriptions to receive information and DPR-EC-01011.3 on Targeted consultation activities respectively.

More generally, other community users may share content locations external to the BIK community and not managed by European Schoolnet on behalf of the Commission or by the Commission. Those would then be subject to their own privacy policies on which the Commission and European Schoolnet have no control. We therefore recommend that you carefully review the relevant privacy policy of each content location when redirecting to external content locations suggested on the community.

The information we collect will not be given to any other third party than the ones mentioned previously in this statement, except to the extent and for the purpose we may be required to do so by law.

## **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, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Under certain conditions, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing and the right to data portability.

As a user of the community, you can either modify, hide or delete most of your posted content. As a user, you may also edit or delete your optional profile information.

Additionally, you may ask the Data Processor to edit or remove your mandatory profile information and terminate your account. The user's created content on the platform will then be pseudonymised or deleted depending on the case. If pseudonymised, your name, as it appears next to the content created and posted, will be changed to "Anonymous", but the content will remain on the community page.

Insofar you have consented to the certain processing of your personal data by the Data Processor and the Data Controller for the present processing operation, you can withdraw your consent at any time by notifying the Data Processor (or the Data Controller if your request could not be resolved by the Data Processor) using the contact information in Section 9. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can also exercise your rights by contacting the Data Processor, the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given in Section 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified in Section 10 below) in your request.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within 1 month of receipt of the request. That period may be extended by 2 further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

As a user of the BIK Community and/or its Youth Closed Area, you may wish to first carry out a number of steps autonomously, namely to:

- Edit or delete your optional profile information at any time.
- Opt out of Matomo without affecting how you visit our site.
- Control and/or delete cookies as you wish – for details, see [aboutcookies.org](https://aboutcookies.org). You can delete all cookies that are already on your computer and you can set most browsers to prevent cookies from being placed. If you do so, however please note that you may have to manually adjust some preferences every time you visit the community and some services and functionalities may not work.

## **9. Contact information**

Any and all changes to this privacy statement will be posted here, and will take effect upon their publication.

### **- The Data Processor**

For any questions or concerns about this privacy statement or the BIK Community or Youth Closed Area, please contact the Data Processor: EUN Partnership aisbl (European Schoolnet) at [privacy@eun.org](mailto:privacy@eun.org).

Your questions will be transferred to the contracting authority and Data Controller if necessary. However, in case the Data Processor does not sufficiently resolve your query, you may also contact the Data Controller directly.

### **- 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, namely the European Commission's Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet at: [CNECT-G3@ec.europa.eu](mailto:CNECT-G3@ec.europa.eu)

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto: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](mailto: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.

## **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-09707.1**.