



EUROPEAN COMMISSION

## **PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** Processing of personal data on the Better Internet for Kids (BIK) Portal (<https://www.betterinternetforkids.eu>) and its minisites (<https://www.bikyouth.eu>, <https://www.saferinternetday.org>, <https://www.positiveonlinecontentforkids.eu>) including IP addresses, by visitors of the publicly available websites.

**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 (aka European Schoolnet), Rue de Trèves, 61 (3rd floor), 1040 Brussels, Belgium.

**Record reference:** DPR-EC-09706.1

### **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**

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) n° 45/2001).

This privacy statement explains the reason for the processing of your personal data, on the Better Internet for Kids (BIK) Portal and its minisites, managed by EUN Partnership (hereinafter referred to as European Schoolnet or the data processor/contractor) on behalf of the Directorate-General for Communications Networks, Content and Technology, Unit G3: Accessibility, Multilingualism and Safer Internet of the Commission (the data controller). It describes 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.

The information in relation to processing operation "*Data processing on the Better Internet for Kids (BIK) Portal and its minisites*" undertaken by European Schoolnet on behalf of the Commission, Directorate-General for Communications Networks, Content and Technology (CNECT), Unit G3: Accessibility, Multilingualism and Safer Internet is presented below.

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

Purpose of the processing operation: The Commission's Directorate-General for Communications Networks, Content and Technology offer a number of external websites managed by European Schoolnet as the Commission's contractor. The technical setup collects and uses your personal information to be able to provide the websites which are physically located outside the Commission controlled hosting infrastructure. These websites are:

- the Better Internet for Kids (BIK) Portal:
  - <https://www.betterinternetforkids.eu>
- and the BIK minisites:
  - <https://www.bikyouth.eu>
  - <https://www.saferinternetday.org>
  - <https://www.positiveonlinecontentforkids.eu>

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 Portal and its minisites only. For further information on the processing of your personal data on the BIK Community please refer to the Data Privacy Statement for the BIK Community and its Youth Closed Area (DPR-EC-09707.1 for Communities).

Furthermore, feedback forms might be used as a contact channel.

Your personal data will not be used for an automated decision-making including profiling.

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

We process your personal data on several grounds:

- **Article 5(1)(a) of Regulation (EU) 2018/1725:** this processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body.

Indeed, informing the broad public is a task resulting from the European Commission's own prerogatives at institutional level, as provided for in Article 58(2) (d) of Council Regulation (EC, Euratom) No 2018/1046 of 18 July 2018 on the Financial Regulation applicable to the general budget of the European Communities (OJ L 193, 30.7.2018, p. 1). We ensure that adequate and specific safeguards are implemented for the processing of personal data, in line with the applicable data protection legislation.

- **Article 5(1)(d) of Regulation (EU) 2018/1725:** for the processing activities consisting in collecting user preferences using [cookies](#), collecting analytics using a web analytics software, providing feedback/contact forms, your consent is necessary. In compliance with Article 3(15) and Article 7 of Regulation (EU) 2018/1725, the consent must be freely given, specific, informed and unambiguous.

We have obtained your consent directly from you. You may have expressed it by selecting and accepting cookie settings or privacy settings, by email, by submitting an e-registration form, or in any other written form. You may withdraw your consent at any time, please see contact details provided under heading 9.

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

In order to **carry out this processing operation**, we collect the following categories of personal data:

- Internet Protocol address (IP address) used to access the website.

Without this processing you will not be able to establish a technical connection between your devices and the server infrastructure and therefore will not be able to access our website.

In order for you to use our **feedback/contact form**, we collect the following categories of personal data when and if you contact us through the forms available on our websites:

- Name
- E-mail address
- Any personal data in the free text field called "Comment".

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

So as to understand how visitors use and engage with the BIK Portal and its minisites, we collect information anonymously and report website trends without identifying individual visitors through the use of web analytics softwares.

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply (e.g. via the comment section of the BIK Portal feedback/contact form).

Please note that the Data Controller does not request or expect that data subjects provide any 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’s sex life or sexual orientation”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data, the data subject is considered to provide his/her explicit consent to the processing, in accordance with Article 10(2)(a) of Regulation 2018/1725.

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

We only keep your personal data for the time necessary to fulfil the purpose of collection or further processing and in line with your cookies preferences.

In addition, server access log files, where IP addresses are recorded are kept only during 2 weeks after the Portal visit.

As to the feedback/contact forms, data is kept during 2 years from the moment the form is submitted.

#### **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 European Schoolnet servers on behalf of the European Commission. 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 European Commission.

The Commission’s contractors, including European Schoolnet, are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States (‘GDPR’ [Regulation \(EU\) 2016/679](#)).

In order to protect your personal data, the Commission and European Schoolnet have 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.

## **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.

### **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 under Section 8.

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

Google Analytics and Matomo are currently both used to collect information anonymously in order to understand how visitors use and engage with the BIK Portal and its minisites, 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 both Google Analytics and Matomo.

### **Third Party IT tools – Social Media**

Additionally, via the BIK Portal you may be able to watch our videos, which may be uploaded to one of our social media pages or follow links from our website to other relevant social media.

In order to protect your privacy, our 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/links or videos, no cookies will be installed on your device by third parties.

If, as a visitor, you decide to view such third-party content on our websites, 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, links to forms linked to event registrations, e-newsletter subscriptions or online surveys may be available on the BIK Portal. Please note 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.

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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

For the processing activities that rely on consent and that are pursuant to Article 5(1)(d) and are those mentioned in Section 3 (i.e for the processing activities consisting in collecting user preferences using cookies, collecting analytics using a web analytics softwares, providing feedback/contact forms), you have consented to provide your personal data. You can withdraw your consent at any time by notifying the Data Processor, and if your query is not sufficiently resolved, you can also contact the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.

You can 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 under Heading 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 under 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 when 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 Portal and its minisites, you may wish to first carry out a number of steps autonomously, such as to:

- Opt out of Google Analytics (by visiting the relevant [Google](#) page) or opt out of Matomo without affecting how you visit our site.
- Control and/or delete cookies as you wish – for details, see [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 a website including the BIK Portal 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 Portal and minisites, please contact the Data Processor: European Schoolnet at [privacy@eun.org](mailto:privacy@eun.org).

European Schoolnet will transfer your questions 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, whose contact details are the following: [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-09706.1**.