

Privacy statement

Processing of personal data in the EEA Stakeholder Relations Management system

The personal data you provide in the EEA Stakeholder Relations Management (SRM) system is processed in accordance with Regulation (EU) 2018/1725¹ of the European Parliament and of the Council of 23 October 2018 on the protection of natural person with regard to the processing of personal data by the EU institutions, bodies, offices and agencies.

1. Identity of the data controller

European Environment Agency (EEA), Communications Programme, Kongens Nytorv 6, 1050 Copenhagen K, Denmark. Email: subscriptions@eea.europa.eu.

2. Purposes of the processing

Your personal data is collected and further processed so that you can subscribe to receive information on EEA's products, events and webinars related to the areas of interest you have selected in the subscription form. With your consent, this processing includes gathering information on audience preferences, digital behaviour, and our reach within the target audience. This is conducted to optimise the EEA's impact by providing the right information tailored to your interests and ensuring its timely dissemination.

Furthermore, the EEA's stakeholder relations management system (SRM) is used to maintain distribution lists for EEA information and products, and to disseminate electronic notifications and newsletters. The SRM is also used to facilitate the organisation of meetings, events, webinars and conferences for effective communication with participants.

3. Who has access to your information and to whom is it disclosed?

For the purposes detailed above, access to your personal data is granted to a limited number of EEA staff members responsible for the dissemination of electronic notifications and newsletters, and for the organisation of meetings, events, webinars and conferences.

The EEA's SRM is maintained by TRIALTA GmbH, Seumestraße 12, 90478 Nürnberg, Germany, who is the contracted service provider, and acts as data processor on behalf of the EEA. The EEA SRM is licensed from HubSpot Germany.

No personal data is shared with third parties for direct marketing purposes.

¹ OJ L 295/39 of 21.11.2018

4. Categories of data collected and processed

The personal data you encode yourself in the sign-up form is collected and further processed. The data captured via sign-up forms consists of, but is not limited to, the following:

- First name, Last name
- Email
- Stakeholder type: “Select what best describes your area of work”
- Name and type of organisation

Certain fields in the sign-up form are mandatory, while others are optional. Depending on the subscription type you opt-in for, and thus the potentially different requirements of services managing those, different fields may be mandatory or optional. Your consent is required to subscribe to EEA news and newsletters and to any of our other subscriptions. This consent enables you to receive updates, webinar and event invitations pertaining to your selected area/s of interest, and allows us to process your personal data for this specific purpose.

5. Modalities of the processing operation

Personal data is provided through an online sign-up form hosted by HubSpot. This process involves an automated processing operation, where you input your data directly into the online form, which is then stored in a database.

Your behaviour data in relation to your use of the sign-up form (i.e., pages visited, clicks on action buttons) is collected only if you provide your consent through the cookie² policy notification pop-up on the sign-up. For more information on HubSpot’s cookie policy, please refer to this link:

<https://legal.hubspot.com/cookie-policy>.

Upon confirming your subscription to the EEA news and newsletter, you grant consent for the following personal behaviour data to be captured via HubSpot:

- User behaviour to emails (clicks, opens)
- Engagement with EEA social media posts (likes, comments, shares)
- Posts where the EEA is tagged or where certain hashtags are used in case it is a public social media profile

As mentioned above, this behaviour data is analysed to assist the EEA in gaining a deeper understanding of our audience. For more information, you may consult HubSpot’s privacy policy at this link:

<https://legal.hubspot.com/privacy-policy>.

² Cookies are short text files stored on a user’s device (such as a computer, tablet or phone) by a website.

6. Legal basis and legality of the processing

The processing of your personal data is necessary for the performance of tasks in the public interest or the exercise of official authority vested in the EEA as assigned by the following regulations:

- Regulation (EC) No 401/2009³ of the European Parliament and of the Council of 23 April 2009 on the EEA and Eionet, and in particular Article 2(m) thereof, and
- Regulation (EC) No 1367/2006⁴ of the European Parliament and of the Council of 6 September 2006 on the application of the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters to Community institutions and bodies.

By completing the subscription form, you give your unambiguous consent to the processing operation.

7. How long do we keep your data?

Your personal data will be retained for the duration of your active subscription. In case you wish to permanently erase your data, please send your request to subscriptions@eea.europa.eu. Please be aware that the process of erasing all traces of your personal data may take up to 30 calendar days.

In cases where a subscriber exhibits inactivity, such as not opening newsletters or email notifications, the data will be automatically erased 2 years after the date of the last recorded activity. In such instances, only analytical data will be retained, while personal data will be erased.

Data stored on EEA staff and Eionet members in the SRM will be stored, as long as the staff remain affiliated with the EEA and the Eionet members remain engaged with the organisation.

8. How do we protect and safeguard your information?

In order to protect your personal data, a number of technical and organisational measures have been implemented. Our technical measures include appropriate actions designed 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. Our organisational measures include restricting access to the data to authorised persons with a legitimate need-to-know for the purposes of this processing operation. The EEA is committed to review and update those measures where necessary.

Data collected via HubSpot is stored in Germany, Frankfurt. Customer data is replicated for disaster recovery and back-up purposes to other data centres within the EU.

For more information, please refer to: <https://trust.hubspot.com/>.

³ OJ L 126 of 21.5.2009, p. 13.

⁴ OJ L 264 of 25.9.2006, p13-19

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

If you would like to modify or delete your personal data you should send a request to subscriptions@eea.europa.eu.

You are entitled to have recourse at any time to the European Data Protection Supervisor (<https://edps.europa.eu>; 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 EEA.

You may also contact the EEA's Data Protection Officer (DPO) in case you have any difficulties relating to the processing of your personal data at the following e-mail address: DPO@eea.europa.eu.