

European Data Protection Board (EDPB) Specific Privacy Statement (SPS)

EDPB X (Twitter) account

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1. Introduction

This privacy statement explains how the European Data Protection Board (“the EDPB”/“we”/“us”/“our”) processes personal data in the context of the management of EDPB account on this platform.

2. Who is responsible for the processing of your personal data and under which legal grounds is it processed?

The EDPB is the controller for the processing of personal data in the context of the management of its account on X.

X is a separate controller for the personal data which it processes. To learn more about how this platform processes your personal data, we encourage you to read its privacy policy (available here: <https://twitter.com/en/privacy>).

We process your personal data 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 under Article 5(1)(a) and (2) of Regulation (EU) 2018/1725¹. More specifically, the EDPB Secretariat, which

¹ 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 (Text with EEA relevance.).

manages the EDPB account on X, is responsible for the communication with other institutions and the public, as provided in Article 75(6)(c) GDPR.

We may also be required to process your personal data to comply with a legal obligation under Article 5(1)(b) and (2) of Regulation (EU) 2018/1725. This could be, for instance, when a relevant EU body (e.g., European Court of Auditors) carries out an audit or investigation, when we handle requests for access to documents under Regulation (EC) 1049/2001² or if you request to exercise your data subject rights under Regulation (EU) 2018/1725.

3. What personal data do we collect and for what purpose?

3.1 Processed personal data

- We may post information on the EDPB Chair, Vice-Chairs, the Head of the EDPB Secretariat or other members of the EDPB, the Coordinated Supervision Committee (“CSC”)³ or the EDPB Secretariat staff as well as the EC Commissioners and MEPs in relation to their activities under their respective roles e.g. refer to their public speaking engagements.
- The personal data that we may process in relation to users of X, are those that users have made public on X themselves, for instance:
 - their names and surnames;
 - any other personal data made available by these users of X, such as, but not limited to, their X handle (i.e., username), contact details, picture, views, questions addressed to the EDPB;
- We may also process data in relation to other users of X and their reaction to a tweet or comment or answer where the EDPB is tagged (like, share, comment).

It cannot be excluded that users of X post information that fall in one of the special categories of personal data. This is not under the control of EDPB and it would fall outside our intended use of X, as described above. In such a case, we will ask the person to delete this information and we will propose alternative channels for such submissions e.g. by indicating to them the Supervisory Authority that they could contact in this respect.

We do not use statistics’ services of X. However, in certain circumstances, we may gather specific information, such as the number of likes and retweets on a given post, to measure engagement with posts.

3.2 Purpose of the processing

Through our account on X, we communicate with the general public about EDPB activities, raise awareness about data protection issues and direct citizens with questions to appropriate EDPB communication channels (e.g. EDPB “contact us” page on the EDPB website).

² Regulation (EC) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.

³ https://edpb.europa.eu/csc/about-csc/who-we-are-coordinated-supervision-committee_en

In addition, in some limited cases, content from X could be shared with EDPB members or the EDPB Secretariat also for communication purposes, such as understanding the public's reaction to an EDPB document for the purpose of ensuring proper communication. In these cases, such content may also be processed for record keeping purposes.

4. Who has access to your personal data and to whom is it disclosed?

Personal data contained in the EDPB's posts on X are publicly available and can be visible to both registered and unregistered users of X. With the exception of personal data of EDPB or CSC members, and EDPB Secretariat staff as well as the EC Commissioners and MEPs on whom we may publish posts, we only process personal data which users of X have themselves made publically available.

In addition, as indicated above, any content on X which we may share within the EDPB for communication purposes can also be accessible, in particular, to:

- The EDPB Secretariat, on a need-to-know/need-to-do basis;
- Members of the Board, where necessary;
- The European Commission, where necessary, in the context of its participation in the EDPB activities;
- Bodies charged with monitoring or inspection tasks in application of EU law, e.g. OLAF, European Ombudsman, EDPS as a supervisory authority, Court of Auditors, as well as staff of other services, where necessary in the context of official investigations or for audit purposes;
- The Court of Justice of the European Union, where necessary;
- Members of the public in the context of requests for access to documents, in accordance with the provisions of Regulation (EC) 1049/2001 or Council Regulation (EEC, Euratom) 354/83⁴.

5. How do we protect your personal data?

As the personal data processed are those which are already made publicly available, no confidentiality measures are required.

In any case, access to the EDPB account on X is password protected. The EDPB Secretariat staff members who manage our account on X only connect to this account via their professional devices (e.g. professional laptop or mobile phone). When occasionally content from X is extracted, as indicated in point 3.2 above, it is saved in password-protected servers, with access limited on a need-to-know or need-to-do basis. Physical access to our premises is protected and restricted to authorised personnel only.

⁴ Council Regulation (EEC, Euratom) No 354/83 of 1 February 1983 concerning the opening to the public of the historical archives of the European Economic Community and the European Atomic Energy Community.

We have disabled the possibility for direct messages on X and therefore no additional personal data that has not already been made public are processed via this account. We do not process any personal data beyond what is intentional for the posting on X.

Further, our staff members with access to the account limit the posting of information that could qualify as personal data to the minimum necessary.

6. For how long do we keep your personal data?

Any personal data we process in the context of our interaction with you as a user of X and our account on X are kept on the account for as long as the EDPB account on X exists, unless you decide to delete your post or account, in which case the usage policies of X⁵ apply.

Any comments, views, X handles (i.e., usernames) or other personal data that the EDPB may extract from X for the purposes mentioned above are kept for a maximum of two years, after which, if they are part of documents with historical or administrative value, which are selected for preservation in the EDPB records, the personal data they contain will be kept indefinitely and – unless an exemption applies – be made public in accordance with Regulation (EEC, EURATOM) 354/83 on the opening to the public of historical archives after 30 years.

7. How can you verify, modify or delete your personal data?

As the individual to whom the personal data relate, you can exercise the following rights:

1. access to your personal data under Article 17 of Regulation (EU) 2018/1725;
2. rectify your personal data under Article 18 of Regulation (EU) 2018/1725;
3. erase your personal data under Article 19 of Regulation (EU) 2018/1725;
4. restrict the processing concerning yourself under Article 20 of Regulation (EU) 2018/1725; or
5. exercise the right to data portability under Article 22 of Regulation (EU) 2018/1725.

Please note that these rights are not absolute rights, which means that some exceptions may apply. These rights are applied on a case-by-case basis.

In addition, you can object to the processing of your personal data under Article 23 of Regulation (EU) 2018/1725 for reasons relating to your particular situation. When you contact us to exercise this right, please explain these reasons. We will remove your personal data, unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms.

We do not use your personal data for any automated decision-making or profiling.

To exercise your rights as a data subject, please see sections 9 and 10 below.

⁵ <https://help.twitter.com/en/managing-your-account/how-to-deactivate-x-account#deactivating-vs-deleting>
<https://help.twitter.com/en/using-x/delete-posts>

8. How long do you have to wait to receive our reply to your data subject rights' request?

After receiving your request, we have one month to provide information on action taken on your request. We may extend this period by two further months, taking into account the complexity and number of the requests. In those cases, we will inform you of the extension and its reasons within one month of receipt of your request.

9. Who can you contact to ask questions or exercise your rights?

If you have questions, or wish to exercise your rights as a data subject, please contact us at edpb@edpb.europa.eu or via our [website's](#) contact page (selecting the option "Requests for the EDPB DPO").

10. Who can you contact to complain about the processing of your personal data?

We encourage you to always contact us first to raise your questions or concerns.

In any case, you remain entitled to send a complaint to the European Data Protection Supervisor (EDPS), using the following contact information:

European Data Protection Supervisor (EDPS)
Rue Wiertz 60
B-1047 Brussels, Belgium
edps@edps.europa.eu
<https://edps.europa.eu/>