

## PRIVACY NOTICE CRM

### Protection of Personal Data in relation to the CRM of EIGE

#### Handling of contact data stored in the Agency contacts database

**Purpose:** The purpose of the processing operation is to inform interested parties (data subjects) on the activities of the Agency. Data subjects are registered in the Agency's Customer Relationship Management system following their request.

With regards to the EIGE's Stakeholder groups and EIGE's internal Bodies like EIGE's Stakeholders, NGOs, EIGE's Management Board, and Expert Forum, data (name, organisation, job title, email address) can be used for the purpose of EIGE's stakeholder cooperation activities as defined in EIGE's communication and cooperation framework, notably to include these personal data in a 'country overview of national stakeholders'. These data will only be shared with EIGE's networks and EIGE internal bodies and not further processed in a way incompatible with those purposes.

**Data Controller:** The Data Controller is primarily the Head of Knowledge Management and Communication Unit of EIGE.

**Data Categories:** The data stored are the: name, organisation, job title, postal address, email address, telephones, fax, preferences related to preferred thematic areas on which the Agency undertakes activities. The CRM system also logs information where the data subjects received or opened the e-mails. This is done to allow the Agency to collect statistical data on related email campaigns.

**Legal Basis:** The Legal basis of the processing operation for which the data are intended are Articles 5 (a), (d) of Regulation 45/2001.

**Access to the Data:** Data can be accessed by the Head of the Unit and a restricted number of the Agency's staff members who are delegated to this task.

Data Subjects are informed of the following rights in line with Articles 13, 14, 18, 15, 16 of Regulation 45/2001:

**Right to access data** – data subjects have the right to access data at any time within three months from the receipt of the request by sending an email request to [dpo@eige.europa.eu](mailto:dpo@eige.europa.eu). Furthermore, the Agency launches on an annual basis an exercise offering data subjects the possibility to access their contact and modify it accordingly or choose to opt out.

**Right to rectify** – data subjects have the right to rectify their data without delay of inaccurate or incomplete personal data. Furthermore, the Agency launches on an annual basis an exercise offering data subjects the possibility to modify their contact.

**Right to object** – data subjects have the right to object at any moment. by sending an email request to [dpo@eige.europa.eu](mailto:dpo@eige.europa.eu); and the right to be informed before personal data are disclosed for the first time to third parties or before they are used on their behalf for the purposes of direct marketing, and to be expressly offered the right to object free of charge to such disclosure or use. Furthermore, the Agency launches on an annual basis an exercise offering data subjects the possibility to access their contact and modify it accordingly.

**Right to block** – data subjects have the right to block their data at any moment by sending an email to [dpo@eige.europa.eu](mailto:dpo@eige.europa.eu).

**Right to erasure** – data subjects have the right to obtain from the controller the erasure of data if their processing is unlawful by sending an e-mail to [dpo@eige.europa.eu](mailto:dpo@eige.europa.eu).

If the data subjects have any queries concerning the processing of their personal data, they may address them to the Data Protection Officer or to the Data Controller (Head of KMC Unit) of EIGE by contacting information at [dpo@eige.europa.eu](mailto:dpo@eige.europa.eu).

**Date when processing starts:** The processing starts from the time the data subject requests to be included in the Agency's mailing list to receive any information relating to its activities.

**Data storage:** All data is stored in the Agency's CRM application hosted by the Agency. To allow better management of its communication activities, the Agency makes use of an external "cloud" service provider. This cloud service allows mass emailing and collection of statistical information. For example it provides information regarding the correct sending of the email; whether the recipient opened the email or deleted it etc. The cloud service provider's data center is based in Europe. The information is stored in the CRM application hosted at EIGE's premises and not in the cloud. The Agency uses the statistical information in an aggregated format.

**Retention policy:** The contact information is kept until the data subject decides to unsubscribe from the CRM system.

Any tracking information is kept for a period of 5 + 1 years, where 5 is the reporting period for the evaluation of the Agency's performance as specified in the Agency's mandate.

**Right to have recourse** – data subjects have also the right to have recourse at any time to the European Data Protection Supervisor: <http://www.edps.europa.eu>