



**PRIVACY STATEMENT FOR THE MANAGEMENT OF  
SUBSCRIPTIONS TO RECEIVE INFORMATION**

**Processing operation:** Newsletters and mailing list management related to Climate Pact

**Data Controller:** European Commission  
Directorate-General for Climate Action,  
Unit E.2 Communication, Civil Society Relations & Climate Pact  
[CLIMA-EUROPEAN-CLIMATE-PACT@ec.europa.eu](mailto:CLIMA-EUROPEAN-CLIMATE-PACT@ec.europa.eu)

**Record reference:** DPR-EC-03928

**Table of Contents**

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

## **1. Introduction**

The European Commission is committed to protect your personal data and to respect 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.

This privacy statement explains the reason for the processing of your personal data, 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.

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

Purpose of the processing operation: the controller collects and further processes your personal data so that you can receive information that you have requested on important developments, activities, events, initiatives or thematic issues in the area of (a) service(s) of the European Commission, in particular through articles, reports, interviews, newsletters as well as visual content.

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?**

You have subscribed to receive the information on important developments, activities, events, initiatives or thematic issues in the area of (a) service(s) of the European Commission.

We process your personal data, on the basis of your consent.

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

In order to carry out this processing operation, the controller collects the following categories of personal data.

The following data are needed to ensure the delivery of the service to you as a subscriber:

- Your Name, Surname and E-mail Address

The following personal data is needed for providing you with a more personalised experience (i.e. better targeting the content of the information) and for generating anonymised statistics:

- Title, Country of residence, City, Date of birth, Sector of activity/interest

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

The controller only keeps your personal data for the time necessary to fulfil the purpose of collection, namely until you unsubscribe from the mailing list.

Depending on the technical solutions available, you can either write to the dedicated functional mailbox (Heading 9) and ask to be unsubscribed from the mailing list or follow the unsubscribe link in the information email you have received. Appropriate action shall be taken within a week of receiving the request.

In case where data is kept for statistical purposes, some subscriber's optional data may be kept for 5 years after the closure of the *Operation of the European Climate Pact Secretariat*, providing these do not allow to identify the subscriber anymore and that these are available to a very restricted number of authorised persons performing the processing operation on a need to know basis, for the sole purposes of generating anonymised statistics.

## **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 the European Commission and of its contractor for the Climate Pact and approved subcontractors.

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.

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) are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

The Processor for this processing activity is:

- Ecorys, Belgium
- Climate Alliance, Belgium

The Sub-processors for this processing activity are:

- Ricardo PLC, UK
- Generation Climate Europe, Belgium
- PredictBy, Spain

The up-to-date list can be requested from the Controller as it is prone to changes.

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

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to other authorised Commission staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The controller may also share your information with those processors (Ecorys and its approved sub-processors) for the purpose of managing subscriptions and/or sending information.

Furthermore, we use third-party IT tools including Newsroom. The use of a third-party IT tool does not in any way imply that the European Commission endorses 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.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, 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. Where applicable, 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.

You have consented to provide your personal data to the controller for the present processing operation. You can withdraw that consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise all of your rights under the Regulation by contacting the Data Controller, or in case of conflict the Data Protection Officer. In case of a formal complaint, please 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 Heading 10 below) in your request.

## 9. Contact information

### - **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:

European Commission  
Directorate-General for Climate Action,  
Unit E.2 Communication, Civil Society Relations & Climate Pact  
[CLIMA-EUROPEAN-CLIMATE-PACT@ec.europa.eu](mailto:CLIMA-EUROPEAN-CLIMATE-PACT@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 European 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-03928](#).