

EU in the world – EEAS Mobile Application Data Processing

1. INTRODUCTION

THE PROTECTION OF YOUR PRIVACY, INCLUDING YOUR PERSONAL DATA, IS OF GREAT IMPORTANCE TO THE EUROPEAN EXTERNAL ACTION SERVICE (EEAS), THEREBY REFLECTING THE PROVISIONS OF THE CHARTER ON FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION, AND IN PARTICULAR ART. 8 THEREOF. THE PRESENT PRIVACY STATEMENT DESCRIBES THE MEASURES TAKEN TO PROTECT YOUR PERSONAL DATA WITH REGARD TO THE ACTION INVOLVING THE PRESENT DATA PROCESSING OPERATION AND WHAT RIGHTS YOU HAVE AS A DATA SUBJECT. YOUR PERSONAL DATA ARE PROCESSED IN ACCORDANCE WITH REGULATION (EC) 45/2001 ON THE PROTECTION OF INDIVIDUALS WITH REGARD TO THE PROCESSING OF PERSONAL DATA BY THE COMMUNITY INSTITUTIONS AND BODIES AND ON THE FREE MOVEMENT OF SUCH DATA, AS IMPLEMENTED IN THE EEAS BY THE DECISION OF THE HIGH REPRESENTATIVE OF THE UNION FOR FOREIGN AFFAIRS AND SECURITY POLICY OF 8 DECEMBER 2011. ALL DATA OF A PERSONAL NATURE - NAMELY DATA WHICH CAN IDENTIFY YOU DIRECTLY OR INDIRECTLY - WHICH YOU PROVIDE TO THE EEAS WILL BE HANDLED WITH THE NECESSARY CARE.

2. PURPOSE OF THE PROCESSING OPERATION

Purpose(s) of the processing operation

The purpose of the processing operation is to process data, including personal data in order to develop a new mobile application (for iPhone and Android) and to promote the **EU Events around the world**.

The application is to foster external communication providing online up-to-date information for citizens, partners and third parties.

This activity aims at giving the European Union a positive and coherent corporate image and at maximising the impact of its communication and information efforts by using modern electronic and audio-visual means.

Description

The mobile application 'EU in the World' complements the EEAS and Delegations' websites. It lists events organised by the EU Delegations and Member States, such as cultural events, concerts, conferences and anything that can fall under the idea of a 'cultural dialogue'.

The app contains full listings of cultural and diplomatic events open to the public in delegations and missions across the world.

The app offers content in 28 languages: English; French; Spanish; Portuguese; Arabic; Russian; Azerbaijani; Belarusian; German; Armenian; Indonesian; Italian; Georgian; Macedonian; Kazakh; Korean; Burmese; Portuguese; Romanian; Serbian; Albanian; Tajik; Thai; Ukrainian; Vietnamese; Standard Chinese; Traditional Chinese and Japanese.

The Application is promoted via various channels:

1. Google Play and Apple iTunes

The App is distributed by the stores: Google play and iTunes

2. The EEAS website

The APP will be advertised on a specific page of the EEAS website.

This publicity can be received by individuals who already have or who do not possess an account on one of the two stores. For that the EEAS explicitly specifies that:

Downloading the application implies the existence or the creation of an account on the store.

The EEAS doesn't encourage the creation of these accounts and anyway it is not responsible for data protection of 3rd parties.

All content available on the APP can be alternatively accessed directly on the EEAS website and the APP consists an 'in-facility'.

The privacy statement of the EEAS and the links to 3rd parties policy statements will be available on the EEAS website and on the Application itself.

Statement by Google Play Terms of Service is available here:

https://play.google.com/intl/en-us_us/about/play-terms.html

Statement by Apple iTunes privacy policy is available here:

<https://www.apple.com/legal/privacy/en-ww/>

Data collected by the 2 "stores" are described in the separate privacy policy statements of the 2 companies.

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The EEAS does not share any data with the stores, but when users create an account on one of the stores they have to explicitly OPT-IN, accepting the data protection policy of the store itself.

From that point on the stores might use "user data" to profile the users.

This process is protected by a 3 steps of acceptance (opt –in) mechanism. The user can OPT-out anytime from the last step or can close the account on the store.

1. Creation of the account. The user has to accept data protection policy of the store
2. Download of the app. The user is warned about the possibility to share his/her location. The user is invited to OPT-IN
3. First start of the app. On the first launch of the APP the user is requested to OPT-IN, explicit confirmation is requested to access the users' location.

When the user decides to start using the application the following process is triggered:

- In order to download the APP from the store (fee of cost) the user will click on INSTALL
- If the data subject does not have an account s/he is invited to create an account and log-in – see below
- Data Subject is logged in a message by the store is prompted:
- 'EU in the world' needs access to: location.
- The user clicks on ACCEPT
- The Application is installed.
- In addition, it is implemented that there is the display of a message on the first launch asking an EXPLICIT CONSENT to access location.

3. DATA PROCESSED

The data, including personal data, which will be processed for the above purpose are the following:

- Name
- Surname
- Location (Optional)
- Language preferences

Location and preference on languages, more specifically:

- The application stores 'within the APP' the 'language preferences' of the user
- The user can explicitly request to 'receive notifications from the APP', with the possibility to turn on/off this setting any time.
- The user can explicitly accept to share his/her location, with the possibility to turn on/off this setting any time. When this setting is off, functionalities of the application based on geo-localisation, may not work correctly.
- None of the services mentioned include any data fields falling under Article 10 of the Regulation (EC) 45/2001, with the exception of the case when special categories of data according to Art. 10 of the Regulation (EC) 45/2001 might appear on the website, strictly in case it is linked to the public activity of the public figure (for instance: ethnic origin of a given public figure representing a specific minority)
- Statistical data about the use of the application, such as number of visits and location of the user, can be collected anonymously by the EEAS.
- Google and Apple I TUne may access other personal data – see details of the Privacy Policies. **As** other APP, it uses some 3rd parties components and it is distributed by google play and iOS.

Information collected by Google

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which [ads you'll find most useful](#), [the people who matter most to you online](#), or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Google Account. When you do, we'll ask for [personal information](#), like your name, email address, telephone number or [credit card](#) to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible [Google Profile](#), which may include your name and photo.
- **Information we get from your use of our services.** We [collect information](#) about the services that you use and how you use them, like when you watch a video on YouTube, visit a website that uses our advertising services, or [view and interact with our ads](#) and content. This information includes:
 - **[Device information](#)**
 - We collect [device-specific information](#) (such as your hardware model, operating system version, [unique device identifiers](#), and mobile network information including phone number). Google may associate your [device identifiers](#) or [phone number](#) with your Google Account.
 - **Log information**
 - When you use our services or view content provided by Google, we automatically collect and store certain information in [server logs](#). This includes:
 - □ details of how you used our service, such as your search queries.
 - □ telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
 - □ [Internet protocol address](#).
 - □ device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
 - □ cookies that may uniquely identify your browser or your Google Account.
 - **Location information**

When you use Google services, we [may collect and process information about your actual location](#). We use various technologies to determine location, including IP address, GPS, [and other sensors](#) that may, for example, provide Google with information on nearby devices, [Wi-Fi access points and cell towers](#).

Information collected by iTunes

What personal information we collect

- When you create an Apple ID, apply for commercial credit, purchase a product, download a software update, register for a class at an Apple Retail Store, contact us or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, and credit card information.
- When you share your content with family and friends using Apple products, send gift certificates and products, or invite others to participate in Apple services or forums, Apple may collect the information you provide about those people such as name, mailing address, email address, and phone number. Apple will use such information to fulfill your requests, provide the relevant product or service, or for anti-fraud purposes.
- In certain jurisdictions, we may ask for a government issued ID in limited circumstances including when setting up a wireless account and activating your device, for the purpose of extending commercial credit, managing reservations, or as required by law.

How we use your personal information

- The personal information we collect allows us to keep you posted on Apple's latest product announcements, software updates, and upcoming events. If you don't want to be on our mailing list, you can opt out anytime by [updating your preferences](#).
- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of Apple ID account holders.
- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with Apple, you may not opt out of receiving these communications.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve Apple's products, services, and customer communications.
- If you enter into a sweepstake, contest, or similar promotion we may use the information you provide to administer those programs.

Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as occupation, language, zip code, area code, unique device identifier, referrer URL, location, and the time zone where an Apple product is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website, iCloud services, our iTunes Store, App Store, Mac App Store, App Store for Apple TV and iBooks Stores and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure quality of our services over the Internet, such information will not be associated with your IP address.
- With your explicit consent, we may collect data about how you use your device and applications in order to help app developers improve their apps.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

4. CONTROLLER OF THE PROCESSING OPERATION

The Controller determining the purpose and the means of the processing operation is the European External Action Service. The Division responsible for managing the personal data processing operation is the EEAS Division 'Strategic Communications', EEAS SG. AFFGEN. 1 under the supervision of the Head of Division or the Deputy acting on his/her behalf.

5. RECIPIENTS OF THE DATA

The recipients of your data will be:

- EEAS. AFFGEN. 1
- Google Play
- Apple iTunes
- Third Party Enterprises Google and Apple iTunes is associated with (see Privacy Policy)

The information in question will not be communicated to third parties, except where necessary for the purposes outlined above.

6. PROVISION, ACCESS AND RECTIFICATION OF THE DATA

You have the right to access your personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of your personal data, which will be implemented within [x] working days after your specific request has been deemed legitimate. If you have any queries concerning the processing of your personal data, you may address them to the data controller at the following functional mailbox: Sq-affgen-1@eeas.europa.eu

7. LEGAL BASIS FOR THE PROCESSING OPERATION

The legal basis of the processing operation at stake:

- Europa II: Communication "Towards eCommission: Europa 2nd Generation – Advanced web services to citizens, business and other professional users" (C(2001)1753 of 6/7/01)
- Action Plan to Improve Communicating Europe by the Commission (COM(2005)985)
- Communication from the Commission :The Commission's contribution to the period of reflection and beyond: Plan-D for Democracy, Dialogue and Debate (COM(2005)494)
- White Paper on a European Communication Policy (COM(2006)35)
- eEurope Action plan: objective 3b (eGovernment) commits the Commission to ensuring "that citizens have easy access to essential public data as well as promoting on-line interaction between citizens and government"
- Reform White Paper: Chapter II/VI "Towards the eCommission" (Actions 7, 8 & 9), in particular Strand 3 "Better Public Service to Citizens and Business
- Decision by the SecGens of 25/1/05
- Decision by the Information Resources Management Board (IRMB) of 14/7/95 (mandate: of SEC/91/1127) to set up the Europa server
- The Union's information and communication strategy: The Europa site is one of the key instruments in the implementation of the Union's information and communication strategy, as defined in the following Communications:
 - Communication on implementing the information and communication strategy for the European Union (COM(2004)196) of 20/4/04
 - Communication from the Commission on an information and communication strategy for the European Union (COM(2002)350) of 2/10/02
 - Communication from the Commission on "implementing the information and communication policy for the European Union (COM(2004) 196 final of 20/4/04)
 - Activities relating to the Europa website are covered by ABB 16 04 (Integrated management of communication tools (centralised and decentralised).

All above legal bases aim at performing a task carried out in the public interest in the legitimate exercise of official authority vested in the Union institutions.

At the same time considering the explicit Opt-in of users, the processing of personal data is based on consent (Article 5(d) of Regulation (EC) 45/2001.

legal basis: Good administrative practices in the framework of the Treaty of Lisbon and the Council Decision of 26 July 2010 establishing the organisation and functioning of the European External Action Service (2010/427/EU) available on http://www.eeas.europa.eu/background/docs/eeas_decision_en.pdf

8. TIME LIMIT FOR STORING DATA

Data will be retained until the application is in use. When the application is uninstalled by the user, only anonymized data can be kept for statistical purposes.

Distribution

The application 'EU in the world' is distributed by Google play and Apple iTunes. In order to access certain services, including *notifications*, the user might be required to provide information about himself/herself:

Statement by Google Play Terms of Service is available here:

https://play.google.com/intl/en-us_us/about/play-terms.html

Statement by Apple iTunes privacy policy is available here:

<https://www.apple.com/legal/privacy/en-ww/>

9. DPO CONTACT

In case you have questions related to the protection of your personal data, you can also contact the EEAS Data Protection Office EEAS DATA PROTECTION <data-protection@eeas.europa.eu>.

10. RECOURSE

You have at any time the right of recourse to the European Data Protection Supervisor: edps@edps.europa.eu.