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CC: European Data Protection Supervisor
<EDPS@edps.europa.eu>
Sent at: 14/06/19 12:45:08
Subject: Case 2018-1083: Consultation on EASO social media
monitoring reports (SMM)

Dear colleagues,

Thank you for agreeing to meet with us earlier this week and providing us with useful input on our SMM project.

As agreed during the meeting please find attached the updated versions of the notification form and privacy notice.

We will come back to you as soon as possible with the DPIA.

Kind regards,

Alexandru George Grigore
Data Protection Officer



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Annex 1: DPO notification Form

(to be filled in by EASO's DPO)
Register Number: 2019/24
Date of Submission: 13/06/2019

Legal basis: Article 31 Regulation
2018/1725

Notification to the Data Protection Officer of a Processing Operation Containing Personal Data¹

1/ NAME AND FIRST NAME OF THE CONTROLLER, POSITION, UNIT/CENTRE, TELEPHONE

██████████ – Head of Press and Communications Sector a.i.

2/ SERVICE RESPONSIBLE FOR PROCESSING PERSONAL DATA, TELEPHONE

Press and Communications Sector: ██████████

3/ NAME AND DESCRIPTION OF THE PROCESSING OPERATION

Social Media Monitoring Reports – Developments, updates and changes in sentiment of targeted audiences (potential asylum seekers, applicants for international protection, smugglers, human traffickers, document dealers and diaspora)

4/ PURPOSE OF THE PROCESSING

To provide EASO management and relevant stakeholders (Member States, European Institutions and EU Agencies, UNHCR, IGC, Interpol and IOM) with reports on the latest shifts in asylum and migration routes, smuggling offers and the discourse among social media community users on key issues – flight, human trafficking and EU+ asylum systems/processes.

5/ AUTOMATED/MANUAL PROCESSING OPERATION

Manual

6/ DESCRIPTION OF THE CATEGORY (IES) OF DATA SUBJECT(S)

Social media users (Facebook, Instagram, YouTube, Twitter) with relevant posts relating to EU asylum and migration issues, within Arabic, Pashto, Dari, Urdu, Turkish, Russian, Tigrinya, Kurmanji Kurdish, Pidgin English, Hausa, Edo, as well as French communities).

¹ Please attach all relevant documents

7/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (INCLUDING, IF APPLICABLE, SPECIAL CATEGORIES OF DATA (ARTICLE 10) AND/OR ORIGIN OF DATA)

Identification data (name or pseudo/alleged name, username, user identification and geographical area)

(Occasionally) Certain personal characteristics (age, gender, nationality)

Views and/or comments on migration routes, smuggling of human beings/human trafficking
Images and videos

Images and videos any other information published on a website that is analysed or on a third-party platform.

No personal data is stored or transmitted. Personal data processing is limited to accessing such data visually via a web browser.

As the researchers have native/professional competence in the languages they monitor, social media posts are translated directly and mentally into English and transcribed without the use of any IT tools. They are simultaneously transcribed into the draft report. The social media posts are not collected, recorded, stored, retrieved, transmitted, disseminated or shared with third parties. The same applies to the original text of any posts in the source language, which are not copy-pasted or transferred.

8/ INFORMATION TO BE PROVIDED TO THE DATA SUBJECTS AND THROUGH WHICH MEANS

9/ PROCEDURES TO GRANT DATA SUBJECTS' RIGHTS (RIGHTS OF ACCESS, TO RECTIFY, TO BLOCK, TO ERASE, TO OBJECT)

10/ STORAGE MEDIA OF DATA

Source data is not stored. SMM researchers monitor social media posts which are directly and mentally translated into English and transcribed without the use of any IT tools. They are simultaneously transcribed into the draft report. The social media posts are not collected, recorded, stored, retrieved, transmitted, disseminated or shared with third parties. The same applies to the original text of any posts in the source language, which are not copy-pasted or transferred.

When the researchers deem that the use of a screenshot of the post is necessary, they do so by using a snipping tool, which enables for the blacking out/redacting of images and the blurring of any personal data such as names and phone numbers that may have been included in the original post. Such edits are done via the MS Windows Snipping Tool, thus the original screenshots are not saved on the devices of the researchers. The redacting/blurring of images that are saved and used in the reports cannot be reversed to reveal the personal data.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION:

- Article 5.1.(a) Regulation 2018/1725
- Article 9.3 of EASO Regulation 439/2010

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENTS TO WHOM THE DATA MIGHT BE DISCLOSED

NO PERSONAL DATA IS DISCLOSED. THE DATA PROCESSING IS LIMITED STRICTLY TO THE CONSULTATION OF PERSONAL DATA BY SMM RESEARCHERS WHILST THEY VISUALISE/CONSULT SOCIAL MEDIA POSTS. THERE ARE NO RECIPIENTS OF PERSONAL DATA AS ACCESS TO IT IS LIMITED TO SMM RESEARCHERS.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

No personal data or information that could identify a natural person are stored on any IT systems or PCs. On-screen visual texts are directly translated into English (not copy-pasted, saved, stored or transmitted) without IT tools, while any images which contain personal data are directly redacted to be unrecognizable before being saved, thus making the process non-reversible.

No original data (social media posts) as viewed by the SMM team is saved, stored or transmitted. No personal data is included in the SMM Reports.

The cached memory of the web browsers (internet history of pages which have been visited) will be deleted at the end of every week in order to ensure that no links to the visited social media pages are stored.

14/ TIME LIMITS FOR BLOCKING AND ERASURE OF THE DIFFERENT CATEGORIES OF DATA (FURTHER TO JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECT) (PLEASE SPECIFY THE LIMITS FOR EVERY CATEGORY IF APPLICABLE)

7 days (end of every week), wherein the cached memory of the web browsers are deleted.

15/ HISTORICAL STATISTICAL OR SCIENTIFIC PURPOSES (IF YOU STORE DATA FOR LONGER PERIODS THAN MENTIONED ABOVE, PLEASE SPECIFY, IF APPLICABLE, WHY THE DATA MUST BE KEPT UNDER A FORM WHICH PERMITS IDENTIFICATION)

N/A

16/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS:

N/A

17/ DESCRIBE THE TECHNICAL AND ORGANISATIONAL MEASURES TAKEN TO ENSURE APPROPRIATE SECURITY OF THE PROCESSING - *please check all the points in article 33 of Regulation 2018/1725*

SMM researchers use their native/professional competence in the languages they monitor (on social media) so that posts are translated directly and mentally into English and transcribed without the use of any IT tools. They are simultaneously transcribed into the draft report. The social media posts are not collected, recorded, stored, retrieved, transmitted, disseminated or shared with third parties.

The same applies to the original text of any posts in the source language, which are not copy-pasted or transferred.

When the researchers deem that the use of a screenshot of the post is necessary, they do so by using a snipping tool, which enables for the blacking out/redacting of images and the blurring of any personal data such as names and phone numbers that may have been included in the original post.

Such edits are done via the MS Windows Snipping Tool, thus the original screenshots are not saved on the devices of the researchers. The redacting/blurring of images that are saved and used in the

reports cannot be reversed to reveal the personal data.

The DPO is also to be consulted before the SMM Report is finalised. The DPO will receive the draft report and revise it in order to ensure that no personal data is included in the Report.

Personal data processing is limited to accessing such data visually (by SMM researchers) via a web browser.

Specifically, the following principles are strictly adhered to:

- No personal data or information that could identify a natural person are stored on any IT systems or PCs. On-screen visual texts are directly translated into English (not copy-pasted, saved, stored or transmitted) without IT tools, while any images which contain personal data are directly redacted to be unrecognizable before being saved, thus making the process non-reversible;
- No original data (social media posts) as viewed by the SMM team is saved, stored or transmitted;
- No personal data is included in the SMM reports;
- The only 'processing' of personal data is strictly limited to the SMM Team's visual gleaning of open social media posts on their web browsers;

The cached memory of the web browsers (internet history of pages which have been visited) will be deleted at the end of every week in order to ensure that no links to the visited social media pages are stored.

18/ FURTHER INFORMATION

19/ DOCUMENTS ATTACHED

Recent example of SMM Report attached

THE DATA CONTROLLER DECLARES THE ACCURACY OF THE ABOVE STATEMENTS AND UNDERTAKES TO NOTIFY ANY CHANGE AFFECTING THIS INFORMATION TO THE DATA PROTECTION OFFICER

20/ ADDITIONAL INFORMATION TO BE PROVIDED WHERE PRIOR CHECKING IS REQUIRED: SPECIFIC RISKS PRESENTED BY THE PROCESSING (ARTICLE 39 DPIA / ARTICLE 40 PRIOR CONSULTATION EDPS)

- DPIA
- EDPS consultation

Place and Date: Malta,

The Controller:



Privacy Statement

EASO's Social Media Monitoring (SMM) Reports

The European Asylum Support Office (EASO) monitors social media platforms in order to understand how users view/perceive the latest trends in migration and asylum, and understand the current state of play and discourse among social media community users on key issues – flight, human trafficking and EU/Member State asylum policies and systems.

The output of EASO's SMM activities consists of periodic Reports drafted by the SMM Team and shared by EASO with EU Member State authorities and/or relevant EU Institution and/or EU/UN Agencies. No personal data is included in the SMM Reports. All of the information included in the SMM Reports is carefully scrutinised in order to ensure compliance with the requirements of Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by EU institutions, bodies, offices and agencies and on the free movement of such data.

Identity of the Data Controller:

EASO is the controller for the processing of personal data within the SMM activities.

Purpose:

EASO's SMM activities aim to support the implementation of the Common European Asylum System (CEAS) by alerting Stakeholders, notably migration and asylum authorities of EU+ Member States, as well as relevant EU Institutions / EU Agencies, and relevant International Organisations (UNHCR, IOM, IGC and Interpol) of developments which are relevant to such implementation.

Origin and type of the data processed

The system used by EASO collects and analyses data from public posts by social media users on different social media platforms.) The process is manual and does not involve any automated systems. EASO only processes information that is publicly available:

- Identification data (username, user identification and geographical area)
- Personal characteristics, when available (age, gender, nationality)
- Views and/or comments on migration and asylum routes, smuggling of human beings/human trafficking, EU+ and/or Member State asylum systems and procedures, the situation in countries of origin of applicants for international protection in the EU+;
- Pictures and videos

EASO adheres to strict limitations of the topics it monitors and ensures that its staff are bound by clear instructions and confidentiality obligations.

Who will receive personal data?

No personal data is disclosed or transferred. The data processing is limited strictly to the consultation of personal data by the competent EASO staff members whilst they visualise/consult social media posts. There are no recipients of personal data as access to it is limited to said competent staff.

Legal basis for the processing of personal data:

Article 5.1.(a) of Regulation 2018/1725 and Article 9.3 of Regulation 439/2010.



EASO collects and processes personal data for the performance of EASO's mandated tasks in the public interest. EASO ensures that adequate and specific safeguards are implemented for the processing of personal data, in line with the applicable data protection legislation. EASO has consulted the European Data Protection Supervisor (EDPS) on this matter and complies with the recommendations received.

Data retention / How long will the EASO keep personal data?

No personal data is included in the SMM Reports.

Exercising your rights

You can exercise your rights by emailing EASO at info@easo.europa.eu .

If you have further questions, you can also email EASO's Data Protection Officer at dpo@easo.europa.eu .

Furthermore, you have the right to contact the European Data Protection Supervisor at any time about the processing of your personal data.