

RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)



Personal data processing in the context of Social Media Monitoring /Listening

1) Controller(s)¹ of data processing activity (Article 31.1(a))

EFSA unit in charge of the processing activity: Communication (hereinafter "COM"), ENGAGE Department.

EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu

Is EFSA a co-controller? **No***

If yes, indicate who is EFSA's co-controller:

*: Social media platforms (like LinkedIn, BlueSky, YouTube etc.) are separate controllers for the personal data they process. Users sign up to social media platforms on a voluntary basis, subject to their respective terms and policies. Usually, before accessing social media platforms, users are prompted to accept or decline these terms and policies.

2) Who is actually conducting the processing? (Article 31.1(a))

The data is processed by EFSA itself ☒

Indicate the EFSA units or teams involved in the data processing: ENGAGE Department.

The processing operation is conducted together with an external party ☒

Please provide below details on the external involvement:

EFSA's COM Unit relies on external service providers to aggregate publicly available data gathered on social media platforms and to prepare social media monitoring analysis reports. The providers are

- Fenix Media Limited t/a Pulsar ("[Pulsar](#)"), a company registered in England and Wales. Pulsar's privacy policy can be found [here](#).
- [Hootsuite Inc](#), a company registered in Canada. Hootsuite Inc's privacy policy is available [here](#).
- [Newton Media](#), a company registered in the European Union. Newton's media privacy policy is available [here](#).

3) Purpose of the processing (Article 31.1(b))

The purpose of social media monitoring/listening by the COM Unit of EFSA is:

- (1) to capture and analyse the discourse of institutional partners and stakeholders (Reputational);

¹ The controller decides on the purposes and means of the data processing. In case of joint controllership (e.g. systems of the European Commission applied by EFSA or jointly with another agency), EFSA is a co-controller.

- (2) to engage with institutional partners, stakeholders and users (Engagement);
- (3) to map emerging topics of EU citizens' concern in the area of food safety (Concern scanning);
- (4) to analyse the performance of EFSA's content and understand users' needs (Analytics).

4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):

Processing necessary for:

- (a) a task carried out in the public interest or in the exercise of official authority vested in EFSA ☒
- (b) compliance with a legal obligation to which EFSA is subject ☐
- (c) performance of a contract with the data subject or to prepare such contract ☐
- (d) The data subject has given consent (ex ante, explicit, informed) ☐

Further details on the legal basis:

The processing is necessary for the performance of a task carried out in the public interest by EFSA as mandated by its Founding Regulation (EC) No 178/2002. Specifically, according to Article 8b of the Founding Regulation - 'General principles of risk communication' - EFSA must "ensure that accurate and all appropriate information is exchanged in an interactive and timely manner with all interested parties, based on the principles of transparency, openness, and responsiveness", "take account of risk perceptions of all interested parties" and "facilitate understanding and dialogue amongst all interested parties".

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

- EFSA statutory staff ☒
- Other individuals working for EFSA (consultants, trainees, interims, experts) ☒
- Stakeholders of EFSA, including Member State representatives ☒
- Contractors of EFSA providing goods and services ☐
- The general public, including visitors, correspondents, enquirers ☒
- Relatives of the data subject ☐
- Other categories of data subjects (please detail below) ☐

Further details concerning the data subjects whose data are processed:

The data subjects concerned are users of social media platforms who publicly engage in these platforms on topics relevant to EFSA's work, for example by mentioning topics under EFSA's remit, mentioning EFSA itself, by following EFSA's corporate social media channels, or by being a party that belongs to EFSA's stakeholders.

For the purpose of accessing the Pulsar platform, personal data of EFSA statutory staff and other individuals working for EFSA are processed (surname, name, email address).

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

- | | |
|---|-------------------------------------|
| Name, contact details and affiliation | <input checked="" type="checkbox"/> |
| Details on education, expertise, profession of the person | <input type="checkbox"/> |
| Curriculum vitae | <input type="checkbox"/> |
| Financial details | <input type="checkbox"/> |
| Family, lifestyle and social circumstances | <input checked="" type="checkbox"/> |
| Goods and services the person provides | <input type="checkbox"/> |
| Other personal data (please detail): | <input checked="" type="checkbox"/> |

b) Sensitive personal data (Article 10)

The personal data reveals:

- | | |
|---|-------------------------------------|
| Racial or ethnic origin of the person | <input type="checkbox"/> |
| Political opinions or trade union membership | <input type="checkbox"/> |
| Religious or philosophical beliefs | <input checked="" type="checkbox"/> |
| Health data or genetic or biometric data | <input checked="" type="checkbox"/> |
| Information regarding the person's sex life or sexual orientation | <input type="checkbox"/> |

Further details concerning the personal data processed:

Depending on the circumstances and on the social media platforms used, the following categories of data may be processed:

- Personal data derived from user profiles, including name and surname, username, user identification, geographical area, age and gender.
- Personal data available about social media platform users through their networks and connections: engagement, reach and sentiment, comments, shares of users on a specific topic, networks and connections.
- Personal data available via audiovisual content that may be published on the social media platforms: content information provided by a user, including metadata, such as the location of a photo or the date a file was created, voice recordings, video recordings, or an image of a data subject.

EFSA's social media monitoring activity may specifically cover all types of personalised information broadly related to food consumption and food safety, posted or otherwise rendered public in social media platforms. This may extend to users' sensitive health-related data or philosophical concepts or ideas.

7) Recipients of the data (Article 31.1(d))

Line managers of the data subject ☐

Designated EFSA staff members ☒

Other recipients (*please specify*): ☒

Pulsar, Hootsuite and Newton media reporting is accessible to a limited number of COM Unit staff members in charge, who have personalised user accounts in the system for this purpose.

The providers have limited access for social media analytics purposes to EFSA's social media accounts.

8) Transfers to recipients outside the EEA (Article 31.1 (e))

Data are transferred to third country recipients:

Yes ☒ No ☐

If yes, specify to which third country: England and Wales and Canada.

If yes, specify under which safeguards:

Adequacy Decision of the European Commission ☒

Standard Contractual Clauses ☒

Binding Corporate Rules ☐

Memorandum of Understanding between public authorities ☐

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

On EFSA's Document Management System (DMS) ☒

On a shared EFSA network drive or in an Outlook folder ☐

In a paper file ☐

Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private) ☒

On servers of an external service provider ☒

On servers of the European Commission or of another EU Institution ☐

In another way (*please specify*): ☐

Please provide some general information on the security measures applied:

Pulsar, Newton and Hootsuite provide the services using a SaaS cloud solution. The providers comply with rules on international transfers with data centers located in the EU or within countries with which an adequacy decision for data transfers is in place.

The data are accessed via a secure interface on the providers' websites, which requires each staff member to authenticate using personalized access credentials.

Reports of Pulsar and of Newton are stored on EFSA file systems (DMS, SharePoint).

10) Retention period (Article 4.1 (e))

EFSA aims at detecting trends in communication campaigns and public perception over time. EFSA therefore retains public data in aggregate format as long as needed for this purpose and maximum for 10 years. The data will not be used for any unrelated purpose.

Instead, analysis data on social media users in the EFSA account of the Pulsar, Newton and Hootsuite support system are kept for maximum 2 years, after which they are securely and automatically deleted in accordance with the relevant privacy policy of the platform.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes ☒ No ☐

If yes, please provide some details on the consultation with the ISO:

The ISO has been consulted on the information security postured of the service providers Pulsar, Hootsuite and Newton Media by means of SaaS questionnaire or in different consultation.

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

A Data protection notice on EFSA's social media monitoring activity is available on the EFSA website at: <https://www.efsa.europa.eu/en/personal-data-protection>

Last update of this record: February 2025

Reference: DPO/COM/5