



PRIVACY STATEMENT FOR THE MANAGEMENT OF YOUR PERSONAL DATA

Processing operation: European Climate Pact activities delivered by the European Commission and appointed contractors and sub-contractors.

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

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1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protecting your personal data and to respecting 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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reasons 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.

This privacy statement concerns the processing of personal data by the Commission when managing its activities related to the European Climate Pact, administered by the Directorate-General for Climate Action, Unit E.2. (CLIMA.E.2) and by the units responsible for dealing with processing activities related to the said initiatives in the competent Commission department or service, in particular in relation to third parties acting as “Pact Ambassadors”.

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

Personal data under this Privacy Statement are only collected and processed for the purposes of the European Climate Pact activities, organised by the Commission and shall not be used for any other purposes.

Specific information on these processing activities can be found in the table in Heading 4.

Certain processing activities, e.g. subscription to newsletters can only be carried out with your explicit consent. These processing activities will be subject to a specific privacy statement or consent form.

3. On what legal ground(s) do we process your personal data?

The lawfulness of the processing of your personal data can be based on Article 5.1(a) (public interest task) or on Article 5.1(d) (your consent), depending on the European Climate Pact activities you are involved in.

Please find the legal basis that applies for each processing activity listed in the table in Heading 4 below.

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

The personal data that we collect from you (or which we may have about you due to previous communications and/or other activities under the European Climate Pact) and process for purposes of the European Climate Pact will depend on the activities you are participating in.

When you will be asked for personal data (whether by email, online application form or other), you will be given the option to add your contact details onto the European Climate Pact central mailing list for the purpose of receiving newsletters from the Secretariat and receiving information about relevant events. Specific privacy statements will be made available when your consent is required for additional processing activities. All privacy statements may refer to each other and should be read in conjunction with each other. You can unsubscribe at any stage from the central mailing list by e-mail to contact@euclimatepact.eu.

Depending on the European Climate Pact activities you are involved in, personal data may include:

Purpose of Processing	Categories of Personal Data	Data Subject(s) & source of data	Legal basis
Ambassador and Partner application	First name, last name, e-mail, telephone number, age group, gender, country of origin, region/ city of residency, social media profile links, place of work, role in the organisation and about the Ambassador and Partner activities and actions.	Ambassador and Partner representative	Consent
Publication of Ambassador and Partner details on the Climate Pact website and other European Commission websites	First name, last name, e-mail, gender, age group, country of origin, region, city of residency, social media profile links, place of work, other relevant information regarding skills and competencies, audiovisual material (including pictures, videos).	(candidate(s) and confirmed), legal representative, contact person in the organisation, natural person submitting the application, inquiry etc. Source: Data subjects	Consent
Communications with the Pact Secretariat (including Country Coordinators and PR Agencies)	First name, last name, e-mail, telephone number, age group, gender, country of origin, region, city of residency, social media profile links, place of work.		Consent
Placing an event on the Climate Pact website through Pact Secretariat	First name, last name, e-mail, contact telephone number, country, region, city of residency, social media profile links, place of work, information about the event for which an application is submitted	<ul style="list-style-type: none"> • Satellite event registrant • Legal representative, contact person in the organisation, natural person submitting the request. Source: Data subjects	Consent
Communication activities	First name, last name, e-mail, telephone number, age group, gender, country of origin, region/ city of	Stakeholders who agree to be featured in Climate Pact communication channels	Consent

Purpose of Processing	Categories of Personal Data	Data Subject(s) & source of data	Legal basis
	residency, social media profile links, place of work, role in the organisation and financial data of speakers (if required), skills and competencies, quotes, audiovisual material (including pictures, videos, recordings, streaming of the event).	Source: Data subjects	
Events organisation and implementation, including follow-up	First name, last name, e-mail, telephone number, age group, gender, country of origin, region/ city of residency, social media profile links, place of work, role in the organisation, financial data of speakers (if required), skills and competencies, audiovisual material (including pictures, videos, recordings, streaming of the event), dietary and access requirements	Stakeholders who agree to take part in Climate Pact events (members of Pact Community or other stakeholders) Source: Data subjects	Consent
Engagement activities (including consultations)	First name, last name, e-mail, telephone number, age group, gender, country of origin, region/ city of residency, social media profile links, place of work, role in the organisation, skills and competencies, audiovisual material	Stakeholders who agree to take part in Climate Pact events (members of Pact Community or other stakeholders) Source: Data subjects	Consent
Registration of information about citizen engagement activities (through registration and result surveys)	First name, last name, e-mail, region/city and country in which the activity took place, age group, gender, social media links, detailed information about the citizen engagement activity	Citizens (including Ambassadors) who facilitate citizen engagement activities	Consent

Purpose of Processing	Categories of Personal Data	Data Subject(s) & source of data	Legal basis
	planned and implemented		
Collecting information about users on the website. A dedicated cookies policy is available here and contain all relevant information related to cookies.	Cookie	All website's users	Consent for non-functional cookies.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing as described below; however, the indicated retention period may obviously be shortened by any data subject request to be forgotten (art. 19).

5.1 Personal data derived from the Ambassador/Partner application form and renewals forms After initially being processed by the Data Controller or its processors, personal data may be stored until a data subject ceases to be a Climate Pact Ambassador or until maximum 3 (three) years after the closure of the *Operation of the European Climate Pact Secretariat*.

Please be advised that the retention period is only an estimate and, it may vary depending on the nature of the data, why it is collected and processed, and relevant retention requirements prescribed by law.

5.2 Personal data derived from stakeholder outreach, and online contact forms on the Climate Pact online webpages (and associated partner websites)

After initially being processed by the Data Controller or its processors, personal data may be stored for a maximum period of 3 (three) years after the closure of the *Operation of the European Climate Pact Secretariat*.

Please be advised that the retention period is only an estimate and, it may vary depending on the nature of the data, why it is collected and processed, and relevant retention requirements prescribed by law.

5.3 Personal data available via audio-visual content

Personal data may be stored for a maximum period of 3 (three) years after the closure of the *Operation of the European Climate Pact Secretariat*, but Selected audiovisual content may be archived for permanent preservation, in line with the provisions of the Common Commission Level Retention List (SEC(2019)900/2), for historical purposes to document, preserve and make available the history and audio-visual heritage of the Commission and the European Union.

5.4 Reports, paper and electronic records, including ARES records kept by DG CLIMA

All paper and electronic records concerning the day-to-day correspondence, calls for proposals and/or interest together with the resulting contractual/financial files as well as reports containing aggregated data will be archived according to the Common Commission Level Retention List (SEC(2019)900/2) and stored in ARES (Advanced Records System) under the responsibility of Secretariat-General (see Notification DPO-1530.4) for a period of 3 (three) years with the application of sampling and selection techniques.

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 either on the servers of the European Commission (located on the premises of the Directorate-General in Brussels and in the DG DIGIT datacentre in Luxembourg), or of its contractors, all inside the EU or United Kingdom. Where necessary, personal data are also held by external service providers for the purpose of providing and supporting the services mentioned in this privacy statement (e.g., registration, streaming purposes). These service providers may be located outside of the EU (for example Cvent, Aventri, Webex, Zoom). However please be assured that 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 Commission.

The Commission's contractors are bound by specific contractual clauses for processing operations of personal data on behalf of the Commission and by the confidentiality obligations deriving from the [Regulation \(EU\) 2018/1725](#).

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 personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

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

Access to your personal data is provided to authorised personnel of the EU institutions and to approved contractors and partners linked to the European Climate Pact. These parties are responsible for carrying out processing operation based on a "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The contractors for this processing are:

- Ecorys Europe EEIG – GEIE , Belgium
- Climate Alliance, Belgium

As sub-processors may be added or removed during the processing operation, the updated list of sub-processors can at all times be obtained from the controller.

As stated under Heading 6, your information may be shared with certain external service providers for the purposes mentioned in this privacy statement some of which may process data outside of the EU.

We use social media (Twitter, Facebook, Instagram, LinkedIn and YouTube) to inform about and promote the network. These social media may use cookies that collect your personal data in the event that you click on the social media link. The Data Controller has no control or responsibility on these third-party cookies. Therefore, we recommend you read these social media privacy policies before clicking on these social media links.

Furthermore, we may use other third-party IT tools including EUSurvey, Microsoft Teams, CIRCABC, Open Social, Webex, EU Academy, Zoom, CIVICRM, Slido, Miro, Newsroom, EIS (Ecorys' financial system that will be used for processing invoices of the experts), receipt of voiceover recording via email or voiceover company portal. The use of a third-party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. If such tools are used, we shall inform you thereof. It remains your choice to accept their privacy policy and to provide personal data or not.

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 other third party, except to the extent and for the purpose we may be required to do so by law, including the possible transmission of personal data to EU bodies or institutions in charge of audit or inspection in accordance with the EU Treaties.

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. As regards this processing operation, you can exercise the following rights:

- the right to access your personal data (Article 17 of Regulation (EU) 2018/1725);
- the right to rectification in the case that your personal data is inaccurate or incomplete (Article 18 of Regulation (EU) 2018/1725);
- the right to erasure of your personal data (Article 19 of Regulation (EU) 2018/1725) where their processing is based on your consent or if your objection to their processing was successful;
- where applicable, the right to restrict the processing of your personal data (Article 20 of Regulation (EU) 2018/1725);
- the right to data portability (Article 22 of Regulation (EU) 2018/1725);
- and the right to object to the processing of your personal data (Article 23 of Regulation (EU) 2018/1725), which is lawfully carried out pursuant to Article 5(1)(a);

- the right related to automated individual decision making, including profiling (Article 24 of Regulation (EU) 2018/1725).

You can exercise your rights by contacting the Data Controller, or in case of conflict, the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. The contact information can be found under Section 7.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description, i.e. Record reference 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

- The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (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) 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 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-09866.2](#).