



EUROPEAN COMMISSION
SECRETARIAT-GENERAL

Directorate A - Strategy, Better Regulation & Corporate Governance
SG.A.1 - Policy Priorities & Work Programme

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: School video competition 'ImagineEU' ('the competition')

Data Controller: European Commission, Secretariat-General, Unit SG.A.1 'Policy Priorities & Work Programme'

Record reference: DPR-EC-09286

Table of Contents

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

1. Introduction

The European 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 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 in the context of the school video competition 'Imagine EU' organised by Unit A.1 of the European Commission's Secretariat-General in the context of the European citizens' initiative outreach activities.

It explains 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?

The European Commission carries out communication and outreach activities in relation to the European citizens' initiative in accordance with Article 18(1) of Regulation (EU) 2019/788 (the ECI Regulation). Its objective is to 'raise public awareness about the existence, objectives and functioning of the European citizens' initiative (...), thereby contributing to promoting the active participation of citizens in the political life of the Union.'

The school video competition is one of these communication and outreach activities. For the purposes of the competition, Unit SG.A.1 collects and further processes your personal data to provide you with information about the competition (before, during and after) and to process your application for participation in that competition. The data collected will be used for the implementation of the competition. For the purposes of this competition, a registration form will be developed within the website <https://europa.eu/citizens-initiative>. The Data Controller collects personal data through the website and through scanned authorisation forms (submitted through the website).

For the pre-selection purposes, a list with the submitted videos and the data provided will be extracted from the website and saved temporarily on a special webpage stored on the European Commission's servers.

Your data will be collected manually, via the contractor (Netcompany – Intrasoft S.A., 2b, rue Nicolas Bové, L-1253 Luxembourg, G.D. Luxembourg, email: ECI_team@eutaketheinitiative.eu).

Each video will be evaluated by the contractor to ensure that all applications are correct and the video eligible for publication.

The 10 videos with most votes from the public will be evaluated by the competition jury, composed of: 2 European Commission officials; 1 representative of the European Economic and Social Committee and 2 representatives of the ECI communicators' network (ECI Ambassadors or national contact points).

The videos of the winners edited for the purposes of the competition will be published on the official social network accounts of the Commission including Facebook, YouTube, Instagram, LinkedIn and Twitter, the Europa website and the audio-visual library of the Commission.

For extended communication and promotional purposes, the winners' videos and photos may be shared with and used by selected journalists, national agencies, and other EU bodies or for promotional activities such as exhibitions or publications (e.g. articles, blog-posts).

The personal data will not be used for automated decision-making including profiling for direct marketing.

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

The video competition is organised as an activity implementing Article 18(1) of the ECI Regulation which requires the Commission to 'raise public awareness about the existence, objectives and functioning of the European citizens' initiative through communication activities and information campaigns, thereby contributing to promoting the active participation of citizens in the political life of the Union.'

The processing operations on personal data, linked to the organisation, management, follow-up and promotion of the competition (including photos, videos submitted to the competition, and audio-visual recordings during the award ceremony in Brussels) require specific consent of the data subjects concerned in accordance with Article 5(1)(d) of Regulation (EU) 2018/1725 (the data subject has given consent to the processing of his or her personal data for one or more specific purposes).

In accordance with Article 8(1) of Regulation (EU) 2018/1725 on the conditions applicable to a child's consent in relation to the offer of information society services directly to a child, 'the processing of the personal data of a child shall be lawful where the child is at least 13 years old.' The video competition is not open to children below 13 years of age.

Both the participants and their parents/legal guardians must sign the Authorisation Form, which is required for:

1. Participation in the competition (registration, management of the competition, preselection, sharing the best videos with the external contractor for the follow-up of the award).
2. Filming and/or photographing the participants for the purposes of the competition, including appearance in the videos.
3. Promoting the competition and five best videos via the Commission's channels (for example: Europa website, Commission's YouTube, Facebook, LinkedIn, Twitter & Instagram accounts).
4. Promoting the competition and five best videos via external channels (for example: selected journalists, national agencies, and other EU bodies or for promotional activities such as exhibitions or publications).

By signing the Authorisation Form, participants and their parents/legal guardians give their consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to process their personal data for those specific purposes and the appearance of the school pupils in the videos.

Consent can be withdrawn at any time by contacting the Data Controller at SG-ECI-INFO@ec.europa.eu.

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

In order to carry out this processing operation, the Data Controller collects the following categories of personal data:

- *First and last name of the accompanying teacher;*
- *Contact details of the teacher/school (e-mail address, phone number, name of the school, country);*
- *First and last names of each student in the team;*
- *Date of birth of each student in the team;*
- *Students' residential address;*
- *Students' signatures in the Authorisation Form;*
- *Parents'/legal guardians' first and last names and signatures in the Authorisation Form;*
- *Audio-visual content: video of the subject or any other content from which the subject can be visually recognized (URL of the video uploaded to a video platform (YouTube/Vimeo);*
- *Language of the video;*
- *Written content: transcripts.*

Videos taken for the purposes of the competition as well as photos and audio-visual recordings taken during the competition and the award ceremony, may be published on the competition's website and other Commission websites subject to consent of the participants and their parents/legal guardians in the Authorisation Form.

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.

All personal data related to the organisation and management of the competition (this includes the information given during the registration, before, during or after the competition and the award of the prize) will be deleted one year after the last action in relation to the competition.

The videos produced by the participants in the context of the competition and not included in the final selection will be kept for a maximum of 1 year from the collection of the recording.

Published promotional, audiovisual and training content including the winning videos, are kept for an indefinite period of time. Selected audiovisual content may be kept published or archived for permanent preservation, in line with the provisions of the Common Commission Level Retention List

(SEC(2022)400), for historical purposes to document, preserve and make available the history and audiovisual heritage of the European Commission and the European Union.

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. All processing operations are carried out pursuant to Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation ('GDPR' - Regulation (EU) 2016/679).

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.

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 organising and carrying out this processing operation and to other authorised Commission staff according to the 'need to know' principle and to the contractor's (Netcompany – Intrasoft S.A) authorised staff. Such staff abide by statutory, and when required, additional confidentiality agreements.

The contractor and the Commission staff will receive the videos and Authorisation Form for audio-visual recordings. The collected videos will be shared with the jury.

For communication and promotional purposes, the winners' videos will be published on the competition's website and may be shared with and used by selected journalists, national agencies, and other EU bodies for further promotional activities like exhibitions or publications (e.g. articles, blog-posts).

Selected service providers for organisational purposes (such as communication consultants) are contractually bound to process personal data on behalf of and in line with the instructions of the Data Controller, keep confidential any data they process and protect it from unauthorised access, use and retention.

Cookies

Cookies are short text files stored on a user's device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

The registration for the competition takes place via a Commission website. The cookies employed by the Commission on the registrant's device for that purpose will be covered by the cookie policy of the Commission, which is available here: https://european-union.europa.eu/cookies_en. Enabling these cookies is not strictly necessary for the website to work but it will provide a better browsing

experience. Data subjects can delete or block these cookies by deleting their browser's history. This will delete all cookies from all websites the data subjects have visited from their browser. Please note, however, that some stored data may also be lost (e.g. stored login details, website preferences).

To manage and disable cookies, data subjects can follow the relevant instructions for each type of browser:

- [Microsoft Edge](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Safari](#)
- [Opera](#)

When you visit the competition website and when you register, we will keep the browser history of your visit for a maximum of 13 months. This information will then be deleted. The collection, aggregation and anonymisation operations are performed in the data centre of the European Commission under adequate security measures.

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites on Europa. More information is available at: https://european-union.europa.eu/europa-analytics_en.

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can set most modern browsers to prevent any cookies being placed on your device, but you may then have to manually adjust some preferences every time you visit a site/page and some services and functionalities may not work properly (e.g. profile logging-in).

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission's control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

Third party IT tools, including social media

We use third party IT tools to inform about and promote the competition through widely used communication channels, including social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

To enter the competition the video must be uploaded to Vimeo or YouTube. We will use the link you will send us in the application form to present the video on the ECI Forum and ECI webpage and follow links from our website to YouTube, Facebook, Twitter and Instagram.

In order to protect your privacy, our use of third-party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or 'play' on a video to watch it, a cookie of the social media company concerned will be installed

on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties' specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users read the relevant privacy policies of [YouTube](#), [Vimeo](#), [Facebook](#), [LinkedIn](#), [Twitter](#) and [Instagram](#), carefully before using them. These explain each company's policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

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.

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 the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

You have consented to provide your personal data to the Data Controller for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller by contacting SG Unit A.1 at SG-ECI-INFO@ec.europa.eu. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

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. 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 contact the Data Controller (SG-ECI-INFO@ec.europa.eu).

- **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) regarding 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 European Commission, which have been documented and notified to the DPO. 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-09286.