



European Committee
of the Regions

Data Protection Notice

Social Media Use, Community Management and Analysis

1. Introduction

The European Committee of the Regions (CoR) is committed to respecting and protecting your personal data in accordance with [Regulation \(EU\) 2018/1725 \(EUDPR\)](#).

This Data Protection Notice outlines the lawful basis, scope, and purposes for which personal data may be processed in the context of CoR's social media activities and applies to both the public and the CoR members and their alternates.

The CoR uses various social media channels (namely Instagram, Instagram Threads, Facebook, LinkedIn, X, Flickr and YouTube) to regularly inform the public about its activities, raise awareness about recent developments and engage directly with potential and existing users by replying to their comments and questions. Users access these social media platforms voluntarily and are subject to the platforms' own terms and privacy policies.

In addition, the CoR uses Liveblog, an online live reporting tool embedded in its external website, to provide real-time updates and coverage of events. The Liveblog tool integrates privacy-by-design principles and includes a GDPR feature that blocks third-party tracking scripts. Other than cookies strictly necessary for core functionality, no additional tracking or profiling is performed by Liveblog itself. From a technical perspective, standard connection data such as the IP address assigned to the user's internet access at the time of connection is processed only for access and security purposes. IP addresses are not logged, stored, or used for analytical or profiling purposes.

2. Who is responsible for the processing of personal data?

The CoR is responsible (as controller) for the processing of personal data.

The responsible service (delegated controller) is the CoR's Social Media Team, within the Digital Communication and IT Strategy Unit (Directorate D), which can be contacted at socialmedia@cor.europa.eu.

Talkwalker, Hootsuite and LiveBlog are responsible for the processing of personal data on behalf of the CoR, and thus act as processors.

Please note that each social media platform acts as an independent data controller for any personal data it processes when you access and use its services. These platforms apply their own privacy policies and terms of use, which are separate from those of the CoR. We strongly encourage you to review the privacy policies of each platform to understand how your personal data is collected, used, and protected when interacting with their services.

In order to access and interact with the CoR's content on social media platforms (such as by liking, sharing, or commenting on posts), you must first have an account with the respective platform and accept its terms of service and privacy policy. These terms are established independently by the platform and govern how your personal data is collected and processed. The CoR has no control over these platform-specific policies.

3. What is the purpose of the processing?

The CoR may access and process publicly available data (such as comments, likes, shares, usernames, or profile information) that users voluntarily make accessible through their interactions with the CoR's official accounts. This data is used solely for the purpose of informing the public about the CoR's activities, improving communication strategies, and managing its presence across social media platforms.

Social media platforms themselves act as independent data controllers and are responsible for the initial collection and processing of your personal data in accordance with their own terms and privacy policies.

4. What is the legal basis for the processing?

The legal basis for the processing of personal data is Article 5.1.a of the EUDPR, according to which "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body".

5. What personal data are processed?

The personal data processed come from the social media platforms used by the CoR and is publicly accessible. Depending on the circumstances, and depending on the social media platforms used, the CoR *may* process the following categories of data:

- Personal data derived from the users' profile may include name and surname, username or user ID, profile photo, geographical area, and other personal characteristics, if disclosed, such as age, gender, marital status, nationality, language preferences, occupation or academic record.
- Personal data about users of social media platforms that is available through their networks and connections and interactions: posts, engagement, reach and sentiment, comments, number of followers, reposts of users on a specific topic, networks and connections, location.
- Personal data available via audio-visual content that might be published on social media platforms: information in or about the content provided by a user (e.g. metadata), such as the location of a photo or the date of when a file was created, voice recordings, video recordings, or an image of an individual.

In addition, if users choose to interact with the Liveblog, embedded on the CoR's external website (for example, by posting comments or submitting content), they are required to provide a display name, which can be fictional or real. Access to the Liveblog's back end is strictly limited to authorised internal staff members within the CoR's Social Media Team. This team is responsible for monitoring, reviewing, and publishing user comments in accordance with the organisation's moderation policy. The team does not collect any personal data from readers of a Liveblog, and we do not track, profile, or identify individual readers. Users may access Liveblog content anonymously. For users who submit comments, the only information collected and stored is the name provided (which may be fictional) and the comment text itself. This information is stored in the tool's database solely for the purpose of displaying the comment within the blog feed. It is not linked to other data, nor is it shared, sold, or used for profiling.

Further, for statistical and analytical purposes, the CoR processes anonymised and aggregated data (such as total numbers of likes, shares, comments, or reach) to evaluate the effectiveness of its communication activities and improve its social media presence. No personal data in identifiable form is used for these analyses. The CoR uses social media monitoring and management tools, such as Talkwalker and Hootsuite to assist in this processing.

However, in the case of CoR Members and alternates, full anonymisation is not always applied - specifically in contexts where identifying individual engagement is necessary and relevant to the role (e.g., tracking participation levels or highlighting the most actively involved members). This limited use of identifiable data is based on CoR's public-interest task of communicating its work and in fulfilling its institutional and political objectives.

Only authorised staff of the CoR are involved in the social media monitoring and related communication activities.

Before accessing the above-mentioned social media platforms, users are asked to accept or decline their respective policies. Social media users who interact with the CoR (for example, commenting on the CoR's posts) do so after having agreed to the policies of those platforms.

6. Who are the recipients or categories of recipients of your personal data?

The recipients of your personal data are the authorised CoR staff members and contractors working on social media management in the CoR's Digital Communication and IT Strategy Unit. In order to gather and visualise aggregated data for statistical research, the CoR relies on social media monitoring and management tools, which produce reports and analyse aggregated data from the CoR's corporate social media channels (e.g. Talkwalker, Hootsuite), as well as via our website (e.g. LiveBlog).

Where necessary, personal data may be processed on behalf of the CoR by external contractors acting as processors, in full compliance with Regulation (EU) 2018/1725. Such processing is governed by contractual arrangements of framework contracts that impose strict obligations regarding confidentiality, data protection, and the prompt deletion of personal data upon completion of the contracted services.

7. Are your personal data transferred to a third country or international organisation?

Certain services or features of Talkwalker and Hootsuite (such as Talkwalker Social Media Intelligence), may involve data processing in the United States, as some of services are hosted with Amazon Web Services in the United States.

The European Commission has adopted a decision that determined that the United States (commercial organisations participating in the EU-US Data Privacy Framework) offers an adequate level of data protection (see relevant Adequacy Decision via the following [link](#).) Further, relevant records in the Data Privacy Framework List are available via the following [link](#).

8. How can you exercise your rights?

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 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, which is lawfully carried out pursuant to Article 5(1)(a).

You can direct your queries to socialmedia@cor.europa.eu. Your query will be dealt with without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months when necessary.

You have the right of recourse to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under the EUDPR have been infringed as a result of the processing of your personal data by the CoR.

9. How long are your personal data kept for?

In the context of social media monitoring and community management, publicly available personal data (e.g., usernames, comments) is not retained by the CoR beyond the duration of analysis or reporting needs.

Only anonymised and aggregated statistical data (such as number of likes, views, engagement rate) is retained for longer-term performance analysis and internal reporting purposes. This aggregated data does not allow identification of individuals.

The retention of personal data, where applicable, is limited to what is necessary and proportionate. It is regularly reviewed to ensure compliance with data minimisation principles. For CoR Members and alternates, limited identifiable data (such as individual engagement metrics) may be retained only to the extent necessary to support institutional communication and engagement analysis, and in any case no longer than the duration of the individual's mandate, unless further retention is explicitly justified and documented for ongoing communication purposes.

10. Are the personal data collected used for automated decision-making, including profiling?

No, the CoR will not use your personal data to make automated decisions about you. "Automated decisions" are defined as decisions made without human intervention.

11. Will your personal data be further processed for a purpose other than that for which data have been obtained?

No, your personal data will not be further processed for a different purpose.

12. Who do I contact if I have queries or complaints?

If you have any further questions about the processing of your personal data, please contact first of all the data controller at socialmedia@cor.europa.eu.

If your questions concern the processing of your personal data on Youtube, please contact the Audio-Visual team at audiovisualCoR audiovisualCoR@cor.europa.eu.

If your questions concern the processing of your personal data on Flickr, please contact the Photo service team at photocor@cor.europa.eu.

You may also contact the CoR data protection officer (data.protection@cor.europa.eu) and/or the European Data Protection Supervisor (edps@edps.europa.eu) at any time.