



European Committee
of the Regions

Record of processing activity – Working document

Dynamics 365

PART 1 - Record

1. General Information

Reference number	RD3-2
Last update	30/01/2024
Controller	European Committee of the Regions
Directorate	Directorate D
Unit	D.3 Digital communication and IT strategy
Contact details	dynamics4cor@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	N/A
DPO contact details	data.protection@cor.europa.eu
Processor(s)	Microsoft Ireland South County Business Park, One Microsoft Place, Carmanhall and Leopardstown, Dublin, D18 P521, Ireland.
Data processing agreement	N/A

2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>The CoR makes use of Microsoft Dynamics 365 Marketing, an email marketing tool that allows emails to be created and sent, as well as statistics to be generated.</p> <p>Dynamics 365 is a cloud-based platform that allows us to orchestrate personalized emails/journeys to increase the engagement of our audience and have more impact with all our communications.</p> <ul style="list-style-type: none">- Stakeholder relationship management: 360° contact view with one central point of all contact data and history- Email marketing: Keeping the target audience informed about the work of the CoR through newsletters, press releases and similar mailings- Event management via event registration platform: Management of session registrations, automation of confirmation emails, generating e-tickets, reducing manual effort and ensuring a smooth registration experience for attendees- Internal communication (newsletter for members, cultural events etc.)- Analytics/reporting: Via Dynamics Insights we can measure the impact of our mailing based on the open rate, click-through rate and heat map.
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<p>Categories of persons whose personal data are processed</p>	<p>Depending on the purposes of the data processing, the following categories of persons, whose data are processed, could be listed:</p> <ul style="list-style-type: none"> - individual subscribers to our emailings; - recognised experts and other stakeholders in subjects about which CoR is preparing a consultation; - representatives of regional and local bodies who either hold a regional or local authority electoral mandate or are politically accountable to an elected assembly; - past event/survey participants who have expressed interest in staying informed either about our consultations or about all CoR communications; - CoR Members and Alternates; - CoR staff; CoR retirees; Members and staff of other European Institutions; Contacts from "Accredited associations", - "CoR Regional offices", "Europe Direct", "National EU associations" and Permanent Representations; - other external contacts not falling into previous categories and who have subscribed to receive emailings from EventsCoR is preparing a consultation.
<p>Categories of personal data processed</p>	<p>Some or all of:</p> <ul style="list-style-type: none"> - Email address, - last name, - first name, - gender, - organisation, - country represented, - region represented, - NUTS classification, - department, office, job title, mandate start and end date, salutation, languages, - phone number, - X, Facebook, LinkedIn, Instagram account, - street and number, postal code, city, country, - role in the organisation, - areas of interest, and - for CoR Members – political affiliation.
<p>Recipients of the personal data</p>	<p>CoR and CoR/EESC Joint Services staff (officials, temporary agents, contract agents, seconded national experts, trainees), who request it for the purposes of their work , and who are granted access based on the needs of their job , and after having completed the relevant training.</p>
<p>Transfers of personal data to a third country or an international organization</p>	<p>The CoR does not transfer personal data to third countries directly. The data exporter for the transfers which take place under the ILA is the processor (Microsoft Ireland Operations Ltd.) and the data importer the sub-processor (Microsoft Corp.)</p> <p>All personal data in electronic format (emails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the CoR's data centre or in Microsoft data centres in the EU (linked to the EESC-COR M365 tenant).</p> <p>To protect data subjects personal data, the CoR has put in place several strong contractual safeguards, complemented by technical</p>

	<p>and organisational measures. In addition to the general policy of Microsoft to secure personal data by means of pseudonymisation and encryption (at rest and in transit), the risk of disclosure of personal data to third country authorities by Microsoft Ireland and its affiliates is mitigated by customised contractual provisions and technical and organisational measures. Contractual provisions address the way Microsoft responds to access requests, limiting risks to personal data of the customer. 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.</p> <p>Data is not transferred to international organisation(s).</p>
<p>Retention period of the personal data</p>	<p>By default, personal data in Dynamics 365 are kept for an indefinite period, either in an active or inactive status. There is always the "unsubscription" option available for the users and/or the option to be deleted from the database upon request. Data is no longer used after the data subject opts out of all CoR content. Data is deleted without undue delay and in any event within one month upon receipt of the request to do so.</p> <p>Note that CoR and other EU Institutional contacts are updated automatically in Dynamics 365 by other IT services and deactivated when they stop working. If they have no subscriptions then these too are deleted in a certain period of time otherwise they are retained indefinitely or until they unsubscribe globally.</p>
<p>General description of security measures, where possible</p>	<p>Standard Dynamics 365 security is applied.</p>
<p>Data protection notice</p>	<p>Published internally</p>