



European Committee  
of the Regions

## Record of processing activity – Working document

### Social Media Use, community management and analysis

#### PART 1 - Record

##### 1. General Information

Reference number	RD3-7
Last update	04/06/2025
Controller	European Committee of the Regions
Directorate	Directorate D
Unit	D.3 Digital communication and IT strategy
Contact details	socialmedia@cor.europa.eu
Joint controller	N/A
Joint controllership arrangement	Available internally
DPO contact details	<a href="mailto:data.protection@cor.europa.eu">data.protection@cor.europa.eu</a>
Processor(s)	Talkwalker and Hootsuite are responsible for the processing of personal data on behalf of the CoR, and thus act as processors.
Data processing agreement	Available internally

##### 2. Purpose and description of the personal data processing

Purpose(s) of the personal data processing	<p>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.</p> <p>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.</p>
Categories of persons whose personal data are processed	<p>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:</p> <ul style="list-style-type: none"><li>- 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.</li></ul>

	<p>- 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.</p> <p>- 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.</p> <p>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.</p> <p>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.</p> <p>Only authorised staff of the CoR are involved in the social media monitoring and related communication activities.</p> <p>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' posts) do so after having agreed to the policies of those platforms.</p>
<p>Categories of personal data processed</p>	<p>In order to gather and visualise data for statistical research, the CoR relies on monitoring tools, which produce the reports and analyse data from the CoR's corporate social media channels (e.g. Talkwalker, Hootsuite). For statistical and analytical purposes for our accounts, only aggregated data provided by the social media platforms (number of likes, shares, comments, videos views, clicks) is used.</p>
<p>Recipients of the personal data</p>	<p>The recipients of the 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.</p> <p>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).</p>

	<p>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.</p>
<p>Transfers of personal data to a third country or an international organization</p>	<p>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.</p> <p>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.</p>
<p>Retention period of the personal data</p>	<p>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.</p> <p>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.</p> <p>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.</p>
<p>General description of security measures, where possible</p>	<ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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.</li> </ol>
<p>Data protection notice</p>	<p><a href="https://cor.europa.eu/sites/default/files/2025-07/cor_social_media_dpn.pdf">https://cor.europa.eu/sites/default/files/2025-07/cor_social_media_dpn.pdf</a></p>