



European Committee
of the Regions

DATA PROTECTION NOTICE

THE USE OF PANORAMIC AND DIALOGUE PLATFORM DURING CoR ACTIVITIES

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](#).

Panoramic platform (of MAKE.ORG company), also called "PanoramicAI", is a cutting-edge AI-driven platform, using Retrieval-Augmented Generation (RAG) processes with generative large language models (LLMs) designed to simplify complex topics into clear, easy-to-understand content. The platform offers concise summaries of public discussions, answers open questions and provides direct access to video or document excerpts for a more comprehensive understanding. By relying solely on verified public documents, Panoramic ensures that individuals, regardless of their expertise or background, can easily access the information they need.

Dialogue platform (of MAKE.ORG company), integrated in the Panoramic Platform application, is a cutting-edge tool designed to collect citizen feedback on projects, public policies, recommendations, or draft laws. The platform presents information through a sequence of short, easy-to-understand cards. Using AI, complex documents are automatically broken down into concise cards with each explaining a key aspect of the project, enabling users to quickly understand the proposal and provide feedback step by step. Citizen input is collected through both quantitative and qualitative responses. Quantitative feedback can be gathered in several formats, including single-choice selections from a list, voting mechanisms, Likert-scale evaluations, or the ranking of multiple options. Qualitative feedback consists of written comments, which can either explain a quantitative response or provide independent input. By combining short explanatory cards, quick quantitative interactions, and optional qualitative contributions, the platform creates a simple, engaging, and user-friendly experience that maximizes citizen participation. AI is also used to analyse the qualitative responses, enabling large-scale synthesis of citizen comments and insights.

Your personal data may be collected and processed in connection with your use of this platform in the context of activities organised or supported by the CoR, including before, during, and after events and/or meetings (hereafter referred to as "events" or "meetings").

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) for processing your personal data is Unit D2-Events and Local Dialogues (email address: events-cor@cor.europa.eu).

MAKE.ORG company acts as processor on behalf of the controller (email: contact-be@make.org).

3. What is the purpose of the processing?

Your personal data will be processed for the following purposes:

- To generate summaries of the event discussions from audio/video recordings and any materials used during the meeting.
- To provide answers to open questions that arise during the meeting.

- To facilitate public access to audio, video or document extracts, allowing for a deeper understanding of the meeting.
- To carry out analyses of contributions submitted via the Dialogue platform in the periods preceding, during, and following events, which may consist of one or more meetings and conferences.
- To evaluate the level of support for the key aspects of projects presented on the Dialogue platform.

These services are supported by PanoramicAI, a content management solution that employs Retrieval-Augmented Generation (RAG) in combination with generative large language models (LLMs) to improve content retrieval and analysis, and by DialogueAI, a participation tool that uses LLMs to analyse contributions submitted by citizens in the context of events and projects.

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. The processing of personal data collected through optional user experience surveys, including any contact details provided voluntarily, is based on Article 5(1)(d) EUDPR (consent of the data subject).

5. **What personal data are processed?**

The personal data processed include:

- Video and audio recordings of the meeting
- Transcriptions of speeches and discussions
- Any other content (e.g., documents, images) shared during the meeting
- Interaction with the LLM, including queries submitted by users via free-text input fields. Such inputs may contain personal data where provided by the user. Users are advised not to include personal data unless it is necessary.
- Tracking data, such as IP addresses and user interactions (e.g., clicks), is used to analyse platform performance, detect technical issues, and enhance usability.
- Responses to optional surveys about user experience, along with voluntarily provided contact details, are collected to assess satisfaction and address potential improvements. This data is processed separately and is not linked to other collected information.

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

Personal data processed during the meeting may be shared with:

- Authorized personnel within the CoR who require access for processing and analysing the meeting content.
- Third-party service providers involved in hosting or maintaining the PanoramicAI system, who process the data solely for the purpose of providing the AI service.
- The general public, in cases where extracts of video or documents are made publicly available for educational, informational, or archival purposes.

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

No, your personal data are not transferred to non-EU member states or to international organisations.

8. How can you exercise your rights?

You have the right to access your personal data, to rectify any inaccurate or incomplete personal data, to restrict (under certain conditions) the processing of your personal data, to request the deletion of your personal data (if processed unlawfully) and, where applicable, the right to data portability. You have the right to object to the processing of your data on grounds relating to your particular situation, at any time.

Where applicable, you have the right to receive your personal data provided to the controller.

You can direct your queries to events-cor@cor.europa.eu. Your query will be dealt without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where 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 applicable data protection provisions 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?

Your personal data will be retained for no longer than is necessary for the purposes for which it was collected and processed, in accordance with the principle of storage limitation.

Retention periods are subject to periodic review to ensure that they remain necessary and proportionate to these purposes. Once the data is no longer required, it will be securely deleted or anonymised.

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 the unit in charge of the processing of your personal data: D2- Events and Local Dialogues (events-cor@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.