



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

according to Article 31 of [Regulation \(EU\) 2018/1725](#)

Title	
EFSA newsletters and email alert management	
1) Controller(s) of data processing activity (Article 31.1(a))	
EFSA unit in charge of the processing activity: Communication, Engagement and Cooperation Department (COMCO) – webupdates@efsa.europa.eu	
EFSA Data Protection Officer (DPO) - DataProtectionOfficer@efsa.europa.eu	
Is EFSA a co-controller?	<input checked="" type="checkbox"/> No
If yes , indicate who is EFSA's co-controller:	
2) Who is actually conducting the processing? (Article 31.1(a))	
The data is processed by EFSA itself	<input type="checkbox"/>
<i>Indicate the EFSA units or teams involved in the data processing:</i>	
The processing operation is conducted together with an external party	<input checked="" type="checkbox"/>
<i>Please provide below details on the external involvement:</i>	
For the registration and management of subscriptions to newsletter and email alerts, EFSA relies on https://www.salesforce.com , a cloud-based CRM tool, the provider of which acts as a processor for EFSA. The newsletter distribution is one of the use cases supported by the Salesforce Relationship Management. More information on the CRM tool is available in the general privacy statement - https://connect.efsa.europa.eu/RM/s/termofuse	
3) Purpose of the processing (Article 31.1(b))	
The purposes of EFSA newsletters and email alerts and the collection and further processing of personal data therein are:	
(1) For subscribers: to receive periodically via email the EFSA newsletters and/or email alerts;	
(2) For EFSA: a means of communicating to the general public on its activities in the field of food and feed safety in accordance with its mandate.	
4) Legal basis and lawfulness of the processing (Article 5(a)–(d)):	
<i>Processing necessary for:</i>	
(a) a task carried out in the public interest or in the exercise of official authority vested in EFSA	<input checked="" type="checkbox"/>

- (b) compliance with a legal obligation to which EFSA is subject
- (c) performance of a contract with the data subject or to prepare such contract
- (d) The data subject has given consent (ex ante, explicit, informed)

Further details on the legal basis:

The EFSA communication activities form part of the tasks carried out in the public interest and for the management and functioning of EFSA as mandated by its Founding Regulation (EC) No 178/2002, in Article 23 and Article 40 thereof.

The subscriptions to the EFSA newsletters and email alert services entails the processing of a limited number of personal data based on the data subject's consent in accordance with Article 5(1)(d) of Regulation (EU) 2018/1725, with the aim of providing the service. The subscriber can opt-in to the following:

- The subscription type: (e.g.: EFSA Highlight, daily alerts),
- The scientific subject areas on which the subscriber/data subject would like to receive information,
- The type of content on which the subscriber would like to receive information,
- Consent for subscription(s) opted for,
- Consent for receiving invitations to events,
- Consent for statistical analysis.

The data subject's consent and subscription is registered and confirmed following a two-step validation process.

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are processed?

- EFSA statutory staff
- Other individuals working for EFSA (consultants, trainees, interims, experts)
- Stakeholders of EFSA, including Member State representatives
- Contractors of EFSA providing goods and services
- The general public, including visitors, correspondents, enquirers
- Relatives of the data subject
- Other categories of data subjects (please detail below)

Further details concerning the data subjects whose data are processed:

Any person with a valid email address can subscribe to EFSA newsletters and email alert services. When subscribing, the user is optionally asked to indicate his/her area of professional occupation according to broad categories in a drop-down list, which allows EFSA to map target audiences interested in its activities. These are: Academia/Research Institute, Citizen, Consultant, EFSA Registered Stakeholder, EU Institution, Industry -

multinational, Industry – small and medium-sized enterprise (SME), International organisation, Media, Non-governmental organisations (NGO), Public authority in EU Member or State public authority outside the EU, Other

6) Type of personal data processed (Article 31.1(c))

a) General personal data

The personal data concerns:

Name, contact details and affiliation	<input checked="" type="checkbox"/>
Details on education, expertise, profession of the person	<input checked="" type="checkbox"/>
Curriculum vitae	<input type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods and services the person provides	<input type="checkbox"/>
Other personal data (please detail):	<input type="checkbox"/>

b) Sensitive personal data (Article 10)

The personal data reveals:

Racial or ethnic origin of the person	<input type="checkbox"/>
Political opinions or trade union membership	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Health data or genetic or biometric data	<input type="checkbox"/>
Information regarding the person's sex life or sexual orientation	<input type="checkbox"/>

Further details concerning the personal data processed:

- The subscriber's name and email address inserted in the subscription form,
- Optionally and only when the data subject provided consent, the area of professional occupation for audience targeting purposes,
- Only when the data subject provided consent, their 'Service Usage Data' which may include device information, logging data and usage data for Salesforce's technical and operational management purposes.

EFSA collects system usage data on subscribers, allowing to measure user satisfaction about EFSA's communication products and to identify possible improvements. The system allows a high-level profiling of subscribers in Salesforce CRM in the sense of Article 15(2)(f) of Regulation (EU) 2018/1725, helping EFSA to identify segments of its audiences based on their engagement level with our communication products distributed by email.

7) Recipients of the data (Article 31.1(d))	
Line managers of the data subject	<input type="checkbox"/>
Designated EFSA staff members	<input checked="" type="checkbox"/>
Other recipients (<i>please specify</i>):	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • EFSA staff in charge of the administration of the subscriptions based on the Salesforce service provision, • Salesforce as EFSA's service provider, its affiliates and any sub-contractors, authorised to use such data for the sole purpose of the performance, management and follow-up of the contract in accordance with applicable data protection laws 	

8) Transfers to recipients outside the EEA (Article 31.1 (e))	
Data are transferred to third country recipients:	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If yes , specify to which third country:	
If yes , specify under which safeguards:	
Adequacy Decision of the European Commission	<input type="checkbox"/>
Standard Contractual Clauses	<input checked="" type="checkbox"/>
Binding Corporate Rules	<input type="checkbox"/>
Memorandum of Understanding between public authorities	<input type="checkbox"/>
<p>The EFSA-related data and information processed in the Salesforce CRM tool is stored in the provider's data centres located in Germany and in France. Although there are no systematic data transfers outside the European Economic Area, the use of the CRM tool may entail <i>ad hoc</i> transfers of personal data outside the European Union, by Salesforce, its affiliates or its sub-processors.</p>	

9) Technical and organisational security measures (Article 31.1(g))	
<i>How is the data stored?</i>	
On EFSA's Document Management System (DMS)	<input type="checkbox"/>
On a shared EFSA network drive or in an Outlook folder	<input type="checkbox"/>
In a paper file	<input type="checkbox"/>

Using a cloud computing solution (please detail the service provider and main characteristics of the cloud solution, e.g. public, private)

On servers of an external service provider

On servers of the European Commission or of another EU Institution

In another way (*please specify*):

Please provide some general information on the security measures applied:

A '[Data Processing Addendum](#)' (DPA) forms part of EFSA's subscription to the Salesforce CRM, providing for 'Standard Contractual Clauses' as an Annex to it. The Salesforce DPA with SCC annex is considered to provide an appropriate safeguard for the data transfers in accordance with Article 48(2)(b) of Regulation (EU) 2018/1725.

A data protection compliance check was carried out based on the contract documents. Overall, the Salesforce contract terms and conditions show a good level of compliance with data protection rules and principles (GDPR). Also a Security Plan on Salesforce is available.

10) Retention period (Article 4.1 (e))

All personal data is retained for as long as the data subject is subscribed, receiving periodically by email the products subscribed to via the 'EFSA.Connect' Salesforce CRM system. A self-service feature contained in each email delivery allows subscribers at any time to edit their subscription or to unsubscribe. After unsubscribing, personal data is deleted from the Salesforce mailing list.

11) Consultation with the Information Security Officer

Was the ISO consulted on the processing operation ?

Yes No

If yes, please provide some details on the consultation with the ISO:

The ISO has been consulted on the Salesforce CRM tool *inter alia* supporting the subscription to EFSA Newsletters and email alerts and a Security Plan on Salesforce is available.

12) Information given to data subjects (Articles 15 and 16)

Has information been provided to data subjects on the way their data is processed including how they can exercise their rights (access, rectification, objection, data portability)? Usually this information is provided in a Privacy Statement, specifying the controller's contact details. As possible, please provide a link to the relevant Privacy Statement or a description.

A general privacy statement on the 'Connect.EFSA' CRM tool is available in the entry point to the tool on the EFSA website - <https://connect.efsa.europa.eu/RM/s/termofuse>

A specific privacy statement concerning the newsletter subscription service is available (linked in in the general privacy statement).

Last update of this record: 28/06/2023

Reference: DPO/COM/6