



EUROPEAN
COURT
OF AUDITORS

Data Protection Statement

Social Media Use by the European Court of Auditors

This data protection statement concerns the European Court of Auditors' (ECA) processing of personal data when managing its social media presence and related communication activities.

The manner in which the ECA processes and protects your personal data is described below.

Users sign up to social media platforms on a voluntary basis, subject to the privacy policies and general terms of social media platforms, as described below. The ECA is not controlling the processing activities subject to these third parties' terms. The ECA is only responsible for the limited processing operations linked to the operation of respective ECA social media pages.

Who is responsible for handling your data?

Data processing operations are under the responsibility of the Press team, under the Directorate of Presidency (DOP).

The ECA and social media platforms are in a joint-controller relationship over the data processing activities on our pages. When you interact with our pages, the ECA processes information about visits to our pages. The social media platforms process personal data on user interactions with the page, including likes, shares, comments, views. These data are aggregated for analytics embedded in the platforms and based on statistics publicly available, such as number of likes that a post has generated. The aggregated data are displayed in a dashboard for page administrators. This dashboard offers insights and metrics on interactions, reach, impressions etc. The social media platforms principally determine the means (their technology) and purposes (operating the platform) for that processing, but the ECA jointly determines the means (by using the pertinent social media platform) and purposes (online communication purposes and analysing users' interactions).

To learn more on how the following social media platforms process your data, please refer to their privacy policies:

- Bluesky: [Terms of Service](#) / [Privacy Policy](#)
- Facebook: [Terms of Service](#) / [Privacy Policy](#)
- Instagram: [Terms of Use](#) / [Privacy Policy](#)

- LinkedIn: [User Agreement](#) / [Privacy Policy](#)
- Mastodon: [Terms of Service](#) / [Privacy Policy](#)
- Threads: [Terms of Use](#) / [Supplemental Privacy Policy](#)
- X: [Terms of Service](#) / [Privacy Policy](#)
- YouTube: [Terms of Service](#) / [Privacy Policy](#)

Why do we collect your data?

The Press team within DOP will process your personal data for facilitating online communication activities lead by the Press team through social media platforms, to analyse how social media users react to ECA activities and gather aggregated data and statistical insights from social media platforms. This helps the ECA to improve its communication activities and to coordinate its social media presence.

For statistical and analytical purposes, the ECA collects and analyses aggregated data about users' behaviour on social media platforms. The ECA relies on media monitoring tools ([Buffer](#)) and manual monitoring to gather and visualise aggregated data, and to produce reports. Only information that is publicly available will be processed and analysed (that may include the data from public posts by social media users on different social media channels).

What are the rules governing the use of your data?

[Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (the “**EU**DPR”) is the legal framework for the processing of personal data within the Court.

The legal basis for the processing of your personal data is:

- Article 5(1)(a) (the processing is necessary to carry out a task in the public interest or in the exercise of ECA's official authority): the processing of personal data linked to the qualitative media monitoring analysis of social media as well as the operation and maintenance of the ECA's social media presence are deemed necessary for the functioning and management of the ECA.
- Article 5(1)(d) (the data subject has given consent to the processing of their personal data for one or more specific purposes): the processing of personal data in case you contact the ECA via social media platforms is based on your consent. By your affirmative action of contacting the ECA you agree to the processing of your personal data for the purpose of responding to your enquiry or comment. You can withdraw consent any time by

contacting the data controller at the functional mailbox provided in the last section of this data protection statement.

What personal data do we process?

The following categories of data will be collected from ECA staff and externals:

- Personal data derived from the user profiles may include:
 - identification details such as name and surname, username, user identification, geographical area, age, gender, pronouns, and other personal characteristics such as marital status and nationality,
 - professional and educational background such as occupation, employment history, academic record,
 - online identifiers such as device ID, IP address, email address and/or cookie identifier.
- Personal data available about users of social media platforms through their networks and connections: engagement, reach and sentiments, comments, shares of users on a specific topic, liked pages, groups, networks, interactions, impressions and connections.
- Personal data processed via third-party platform, app or a website (i.e. Buffer) that may be obtained when using their services. However, for statistical, analytical and monitoring purposes, we only use aggregated data such as numbers of followers, number of interactions (likes, comments, shares), etc.
- Personal data available via audiovisual content that might be published on the social media platforms via photo, video or post.

How long do we keep your data?

Personal data will be stored in the social media in accordance with the retention periods included in the Terms of Service and Privacy Policies of the Joint Controllers jointly responsible of the processing of personal data.

The ECA periodically creates static and dynamic archives¹ of its official social media channels as follows:

¹ “Static” captures may be made up of screenshots, i.e. images, of the social media channel’s main page, or, as it is the case for Youtube videos, as individual files. In the case of Twitter/X, Facebook, Threads and Instagram, the channel content is downloaded from the platform as a hierarchy of folders, along with metadata and index files. Static archives can only be navigated to search for information. “Dynamic” archives are created by using

The Press team within DOP collects and archives publicly available content twice a year. Specifically, it creates static archives from Facebook, Instagram, Threads and X and dynamic ones for Threads and LinkedIn.

The Archive Service creates dynamic archives from Bluesky, Instagram, Mastodon and X monthly. They also archive the videos published on the ECA's YouTube channel as soon as they are published.

Both static and dynamic archives are kept by the Archives Service and stored in a dedicated archiving platform, to which only the Service's staff have access. They can be consulted by ECA staff and external researchers via an online catalogue.

In line with the principles of purpose limitation and data minimisation, the ECA web-archives only include content created by the ECA and published on its own social media channels, meaning that posts, replies and interactions created by external users are not crawled. The ECA strives to limit the processing and storage of personal data. However, certain personal data of social media users, for example usernames, may be collected and archived. For further information, see [Privacy statement on the further processing of personal data for archiving purposes](#).

Who has access to your data and to whom will your data be disclosed?

The Press team have access to your data on a need-to-know basis.

If you lodge a complaint, your personal data may be transferred to the European Ombudsman and/or the European Data Protection Supervisor and/or the ECA Data Protection Officer.

How do we safeguard against possible misuse of or unauthorised access to your data?

Data sets are stored in the ECA's data centre in Luxembourg and are covered by the measures taken to protect the availability, integrity and confidentiality of the institution's electronic assets.

dedicated tools, called web crawlers, which follow links and extract content (text-based and audiovisuals) from websites. The crawled content is saved as WACZ files, which is an index-enriched version of WARC, the web-archives standard file format. WACZ files can be replayed by using a dedicated tool: the visual appearance of the original page is kept and it is possible to follow the links between the pages. Note that archived sites do not always offer the full functionalities of the original site or page, especially in the case of dynamically generated content. Audiovisuals may also not be captured correctly.

Access to personal data is restricted to a specific user group. Access rights are granted on a “need to know” basis, taking account of the role, post and responsibilities of the user concerned. These rights are continuously updated as staff assignments change. All ECA social media accounts are password protected.

The ECA’s Secretary-General has overall responsibility for implementation of the rules on access rights and compliance with the rules on data protection but has delegated responsibility in these areas to different entities. The Court has an information security policy, and an Information Security Officer who ensures that the policy is implemented correctly and that the related checks are tested for efficiency.

What are your rights?

Your rights regarding your personal data are set out in Articles 17 to 24 of Regulation (EU) 2018/1725. Further details about your rights are included in this [document](#).

- You have the right to access your personal data, and to have them rectified without undue delay if they are inaccurate or incomplete.
- Under certain conditions, you have the right to ask us to erase your personal data or to restrict their use. Where applicable, you have the right to object to the processing of your personal data, at any time, on grounds relating to your particular situation, and the right to data portability.
- Where the processing of your personal data is based on your consent, you may withdraw that consent at any time, following which your personal data will be irrevocably removed from our records without undue delay and you will be duly informed, unless deletion is prevented by a legal/contractual obligation.
- The personal data processed will not be used in automated individual decision-making, such as profiling.

You can exercise your rights by contacting the data controller, using the contact information given below.

We will consider your request, take a decision, and notify you of it without undue delay, no more than one month after we have received your request. This period may be extended by two further months, where necessary.

Finally, as specified in [Decision No 42-2021](#), your rights may be restricted under certain circumstances.

Who should you contact if you have a query or complaint?

The first point of contact is the data controller at ECA-socialmedia@eca.europa.eu.

You may contact the ECA's Data Protection Officer (ECA-Data-Protection@eca.europa.eu) at any time if you have any concerns/complaints about the processing of your personal data:

Data Protection Officer
European Court of Auditors
12 Rue Alcide de Gasperi
1615 Luxembourg
LUXEMBOURG

You have the right to lodge a complaint, at any time, with the European Data Protection Supervisor (edps@edps.europa.eu) concerning the processing of your personal data.