

PRIVACY STATEMENT

Last Updated: 22 June 2020

This privacy statement provides information about the processing and the protection of data on the website “Voices from Syria and the region” at URL <https://www.voicesfromsyria.eu/>.

Processing operation: anonymised analysis and tracking of users’ use of the website via Google Analytics

Data Controller: Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR) Unit B1

INTRODUCTION

The European Commission (hereafter ‘the Commission’) is committed to protect and respect the privacy of users. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This Privacy Statement explains how we collect, use, disclose, and safeguard your information when you visit <https://www.voicesfromsyria.eu/>, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the “Site”). Please read this privacy policy carefully. If you do not agree with the terms of this privacy policy, please do not access the site.

We reserve the right to make changes to this Privacy Statement at any time and for any reason. We will alert you about any changes by updating the “Last Updated” date of this Privacy Statement. Any changes or modifications will be effective immediately upon posting the updated Privacy Statement on the Site, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Statement to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Statement by your continued use of the Site after the date such revised Privacy Statement is posted.

The information in relation to the anonymised analysis and tracking of users' use of the website via Google Analytics undertaken by the Directorate-General for Neighbourhood and Enlargement Negotiations / Unit B1 is presented below.

WHY AND HOW DO WE PROCESS DATA?

Purpose of the processing operation: The Directorate-General Neighbourhood & Enlargement Negotiations / Unit B1 collects and uses anonymised data for the purposes of registering a unique ID used to generate statistical data on how the visitor uses the website and of sending data to Google Analytics about the visitor's device and behaviour, and tracking the visitor across devices and marketing channels.

All data processing is transparent and abides by the principle of users opting-in/out, and allowing the data provided to be used for the specific purposes indicated above.

Your personal data will not be used for an automated decision-making, including profiling.

Google Analytics (GA) is used for aggregated, anonymized website traffic analysis. In order to track your session usage, Google drops a cookie (_ga) with a randomly-generated ClientID in your browser. This ID is anonymized and contains no identifiable information like email, phone number, name, etc. We use GA to track aggregated website behavior, such as what pages you looked at, for how long, and so on. This information is important to us for improving the user experience and determining site effectiveness. If you would like to access what browsing information we have - or ask us to delete any GA data - please delete your _ga cookies, reach out to us at NEAR-EUTF-SYRIA@ec.europa.eu and/or install the [Google Analytics Opt-Out Browser Add-On](#).

ON WHAT LEGAL GROUND(S) DO WE PROCESS YOUR PERSONAL DATA

We process your personal data because:

(a) the 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 (Article 5 (a) of Regulation (EU) 2018/1725).

The basis for the processing is laid down by the following Union law:

Article 11 of the consolidated European Treaty on the European Union states: *"The institutions shall, by appropriate means, give citizens and representative associations the*

opportunity to make known and publicly exchange their views in all areas of Union action. The institutions shall maintain an open, transparent and regular dialogue with representative associations and civil society”.

Article 21(1) of the Treaty on European Union (TEU): overall mandate and guiding principles in the field of EU development cooperation; Articles 4(4) and 208 to 211 of the Treaty on the Functioning of the European Union (TFEU).

Informing the broad public is a task resulting from the European Commission's own prerogatives at institutional level, as provided for in Article 58(2) (d) of Council Regulation (EC, Euratom) No 2018/1046 of 18 July 2018 on the Financial Regulation applicable to the general budget of the European Communities (OJ L 193, 30.7.2018, p. 1). We ensure that adequate and specific safeguards are implemented for the processing of personal data, in line with the applicable data protection legislation.

In addition, the processing is necessary for the fulfilment of the European Commission's obligation to ensure visibility of the Union's financial support, as stipulated in Article 4(5) of Regulation (EU) No 236/2014 of the European Parliament and of the Council of 11 March 2014 laying down common rules and procedures for the implementation of the Union's instruments for financing external action, OJ L 77, 15.3.2014.

(b) For specific processing activities, the consent of the data subject is necessary. In compliance with Article 3(15) and Article 7 of Regulation (EU) 2018/1725, the consent must be freely given, specific, informed and unambiguous.

Where data are not marked as mandatory, DG NEAR processes your personal data based on your consent (Article 5 (d) of Regulation (EU) 2018/1725). All data processing is transparent and abiding by the principle of users' opting-in/out, and allowing the data they provide to be used for specific purposes.

We have obtained your consent directly from you. You may have expressed it by an email, submitted via e-registration form, or in any other written form.

We do not process special categories of personal data (Article 10 of the Regulation (EU) 2018/1725).

WHAT TYPE OF DATA IS COLLECTED?

In order to carry out this processing operation the Directorate-General for Neighbourhood and Enlargement Negotiations / Unit B1 collects the following categories of personal data:

Derivative Data

Information our servers automatically collect when you access the Site, such as your browser type, your operating system, your access times, and the pages you have viewed directly before and after accessing the Site. [If you are using our mobile application, this information may also include your device name and type, your operating system, and other interactions with the application and other users via server log files, as well as any other information you choose to provide.]

Facebook Permissions

The Site may by default access your Facebook basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, checkins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the [Facebook Permissions Reference page](#).

Data From Social Networks

User information from social networking sites, such as Facebook, Instagram, Twitter, including your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks.

Mobile Device Data

Device information, such as your mobile device ID, model, and manufacturer, and information about the location of your device, if you access the Site from a mobile device.

Third-Party Data

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the Site permission to access this information.

HOW LONG DO WE KEEP DATA?

The Directorate-General for Neighbourhood and Enlargement Negotiations / Unit NEAR.A2 Inter-institutional Relations and Communication does not store any of the data collected anonymously. By default, Google Analytics stores data tied to an anonymised ID for 26 months. Unless cleared, the '_ga' cookie lasts on the user's browser for 24 months.

Data will be automatically removed at the end of the respective period, when no longer needed or upon users' request.

HOW DO WE PROTECT AND SAFEGUARD DATA?

All data in electronic format are stored either on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#).)

In order to protect data, the Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access. Organisational measures include restricting access to data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

WHO HAS ACCESS TO YOUR PERSONAL DATA AND TO WHOM IS IT DISCLOSED?

Access to the data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Furthermore, access to the data collected via the Site is provided to external contractors working on behalf of and under contractual agreement with DG NEAR and engaged in creation, maintenance, management, and archiving of websites according to the "need to know" principle.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

Cookies and third party IT tools:

Cookies are pieces of text generated by the web services that a user has visited; these text files can be set on the users' devices by the website they are currently visiting ("first party persistent cookies") or by a different website to the one they are currently visiting ("third party cookies").

To facilitate the functioning of our website we may – subject to visitors' consent – place small data files called cookies on your device. They enable the website to remember your actions and preferences (such as login, language, and font size and other display preferences) over a period of time, so you do not have to keep re-entering them whenever you come back to the site or browse from one page to another.

The Site uses cookies to personalise content, to provide social media features and to analyse website traffic. We also share information about your use of the Site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services. At any time. You can change or withdraw your consent from the Cookie Declaration on our website.

The Site uses the following types of cookies:

'First party persistent cookies' enable the tracking of the following information about the visitors to our website:

- IP address (anonymised)
- Location: country, region, city, approximate latitude and longitude (Geolocation)
- Date and time of the request (visit to the site)
- Title of the page being viewed (Page Title)
- URL of the page being viewed (Page URL)
- URL of the page that was viewed prior to the current page (Referrer URL)
- Screen resolution of user's device
- Time in local visitor's time-zone
- Files that were clicked and downloaded (Download)
- Links to an outside domain that were clicked (Outlink)
- Pages generation time (the time it takes for webpages to be generated by the webserver and then downloaded by the visitor: Page speed)
- Main language of the browser being used (Accept-Language header)
- Browser version, browser plugins (PDF, Flash, Java, ...) operating system version, device identifier (User-Agent header)
- Language of the visited page
- Campaigns
- Site Search

The collected data will not be shared with any other organisations for marketing, market research or commercial purposes. Moreover, the abovementioned data cannot be used to identify a particular visitor.

'First party persistent cookies' are created by this website and enable:

- proper functioning of the website;
- the collection of statistics to improve website functionalities – for this purpose, the website uses Google Analytics (more information is provided below);
- social media sharing functions.

'First party persistent' cookies expire after thirteen months (13), after which they are automatically removed from the users' device.

'Technical Session' cookies do not contain any data - they are placed for the duration of a user session (time spent browsing the website). These cookies are necessary to keep the visitor's choice selection when the website is accessed. Once the visitor leaves the website, the session cookie is deleted.

'Third party cookies' (including the Google Analytics cookies) are detailed below.

'Third party cookies' from the Share widget are placed on the computer - if the user opted-in - in order to allow users to share content on social media. The website does not set cookies with the display of links to our social media when you are browsing our website.

OPTING-IN

When the website is accessed first, the website visitor is provided with a choice to accept ("OK, I agree") or refuse ("Decline cookies") the placement of cookies.

Accept cookies: By clicking this option, the visitor gives consent to the placement of all the cookies for the:

- Optimal functioning of the website
- Social media sharing function
- Collection of statistics

Decline cookies: By clicking this option, the visitor does not give consent to the placement of any of the abovementioned cookies. In this case, only a session cookie is placed; this is a technical cookie, the main purpose of which is to remember the visitors' selection choice. This cookie is placed for the duration of a user session (time spent browsing the website) and will automatically be deleted when said session expires. Choosing not to accept cookies does not hinder your navigation experience on the website.

No selection made: If a visitor neither accepts nor refuses cookies, the website treats this as a refusal to the placement of cookies and all related functions are on hold until a selection is made. No cookies shall be placed on visitors' devices, unless consent has been given by clicking on the "OK, I agree" option.

OPTING-OUT

In case a visitor has opted-in to the placement of cookies, it is always possible to change this decision and opt-out. In order to opt-out, visitors need to delete all the cookies from their browser. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. To learn about how to clear cookies in different browsers, visit: <https://www.aboutcookies.org/>.

DO NOT TRACK OPTION

Do Not Track is a technology that enables visitors to opt out from being tracked by websites for whatever purpose, including the use of analytics services, advertising networks and social platforms. You can enable the 'Do not track' option directly in your web browser. Google Analytics will not track users who have enabled this option in their web browsers.

GOOGLE ANALYTICS

The website uses Google Analytics in order to track the information of visitors described above. For this purpose, the abovementioned collected data are transmitted to Google Inc. The IP addresses of visitors are anonymised by the website prior to their transmission to Google Inc; this protects the anonymity of the visitors that have opted for the full website functionalities.

Google complies with the EU-US Privacy Shield Framework and more information on its certification can be found [here](#).

Furthermore, Google, including Google Inc. and its wholly-owned US subsidiaries, has certified that it adheres to the relevant Privacy Shield Principles, including for Google Analytics.

More information on Google's privacy policy can be found [here](#).

More information on the EU-US Privacy Shield can be found on [this page](#).

Google Analytics has implemented a data retention control feature. This feature provides website owners with the flexibility to define a retention period for the data stored within the Google Analytics account. The defined retention period is 26 months; any data beyond this period is deleted from Google servers.

WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) on grounds relating to your particular situation.

You have consented to provide your personal data to the Directorate-General Neighbourhood & Enlargement Negotiations / Unit NEAR.A2 Inter-institutional Relations and Communication for the present processing operation. You can withdraw your consent

at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

CONTACT INFORMATION

- **The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, Directorate-General Neighbourhood & Enlargement Negotiations / Unit NEAR B1, using the functional mailbox NEAR-EUTF-SYRIA@ec.europa.eu.

- **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

WHERE TO FIND MORE DETAILED INFORMATION?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-05826.1

