



European Committee
of the Regions

Data Protection Notice

Dynamics 365 - Contact Management Database

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](#).

Your personal data may be collected and processed for the efficient distribution of the CoR's press releases, newsletters, invitations to events, surveys and any relevant communication in the framework of its activities.

2. Who is responsible for the processing of personal data?

The European Committee of the Regions is responsible (as controller) for the processing of personal data. The responsible service is the Head of Unit for Digital and Social Media, Publications in Directorate for Communication, email: dynamics4cor@cor.europa.eu

3. What is the purpose of the processing?

Dynamics 365 is a cloud-based platform that allows us to orchestrate personalized emails/journeys to increase the engagement of our audience and have more impact with all our communications.

- Stakeholder relationship management: 360° contact view with one central point of all contact data and history
- Email marketing: Keeping the target audience informed about the work of the CoR through newsletters, press releases and similar mailings
- Event management via event registration platform: Management of session registrations, automation of confirmation emails, generating e-tickets, reducing manual effort and ensuring a smooth registration experience for attendees
- Internal communication (newsletter for members, cultural events etc.)
- Analytics/reporting: Via Dynamics Insights we can measure the impact of our mailing based on the open rate, click-through rate and heat map.

4. What is the legal basis for the processing?

The legal basis for the processing of personal data is Article 5.1.a of Regulation (EU) 2018/1725 (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". Where this legal basis is not applicable, your personal data are processed based on your consent (Article 5.1.(d) according to which "the data subject has given consent to the processing of his or her personal data for one or more specific purposes".

5. What personal data are processed?

Some or all of:

Email address, last name, first name, gender, organisation, country represented, region represented, NUTS classification, department, office, job title, mandate start and end date, salutation, languages, phone number, X, Facebook, LinkedIn, Instagram account, street and number, postal code, city, country, role in the organisation, areas of interest, and political affiliation.

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

CoR and CoR/EESC Joint Services staff (officials, temporary agents, contract agents, seconded national experts, trainees) who request it for the purposes of their work and who are granted access based on the needs of their job and after having completed the relevant training.

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

All personal data in electronic format (emails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the CoR's data centre or in Microsoft data centres in the EU (linked to the EESC-COR M365 tenant).

To protect your personal data, the CoR has put in place several strong contractual safeguards, complemented by technical and organisational measures. In addition to the general policy of Microsoft to secure personal data by means of pseudonymisation and encryption (at rest and in transit), the risk of disclosure of personal data to third country authorities by Microsoft Ireland and its affiliates is mitigated by customised contractual provisions and technical and organisational measures. Contractual provisions address the way Microsoft responds to access requests, limiting risks to personal data of the customer. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

Data is not transferred to international organisation(s).

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 object to the processing of your data and to request the deletion of your personal data (if processed unlawfully). You also have the right to withdraw your consent at any time. Please note that withdrawal of consent will not have retroactive effect.

You can direct your queries to Dynamics4cor@cor.europa.eu. The query will be dealt with without undue delay and in any event within one month from receipt of your request. You have the right of recourse 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 CoR.

You can further unsubscribe from receiving specific or any content from the CoR at any time by clicking on the "unsubscribe" link at the bottom of any received email. If you opt out of all CoR content, we will not contact you anymore; however, your data will be kept. If you wish your data to be deleted completely, you should specifically request this in an email to: Dynamics4CoR@cor.europa.eu but bear in mind that there is then the possibility that your contact details might be collected afresh in a future email collection exercise.

9. How long are your personal data kept for?

By default, personal data in Dynamics are kept for an indefinite period, either in an active or inactive status. Data is no longer used after you opt out of all CoR content. Data is deleted without undue delay and in any event within one month upon receipt of your request to do so.

10. Are the personal data collected used for automated decision-making, including profiling?

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?

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 of all the CoR Dynamics team, via their functional mailbox: Dynamics4CoR@cor.europa.eu.

You are also entitled to contact the Dynamics data controller: Head of Digital and Social Media, Publications Unit, Directorate for Communication (dynamicsdatacontrol@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.