



RECORD OF A PERSONAL DATA PROCESSING ACTIVITY

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

Title
EFSA Public Consultations

1) Controller(s) of data processing activity (Article 31.1(a))
<p>EFSA unit in charge of the processing activity:</p> <p>The Head of Unit in charge of the scientific domain in which a Public Consultation is launched, is responsible as controller of personal data processing in the context of the PC in question.</p> <p>EFSA Data Protection Officer (DPO): DataProtectionOfficer@efsa.europa.eu</p> <p>Is EFSA a co-controller? No</p> <p>If yes, indicate who is EFSA's co-controller:</p>

2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EFSA itself <input checked="" type="checkbox"/></p> <p><i>Indicate the EFSA units or teams involved in the data processing:</i></p> <p>Staff of the EFSA Unit in charge of the Public Consultation being launched.</p> <p>The processing operation is conducted together with an external party <input type="checkbox"/></p> <p><i>Please provide below details on the external involvement:</i></p>

3) Purpose of the processing (Article 31.1(b))
<p>The purpose of the EFSA Public Consultation process is to receive the views of stakeholders or people concerned by the specific subject matter of the consultation in question and to publish these on the EFSA website.</p>

4) Legal basis and lawfulness of the processing (Article 5(a)-(d)):
<p><i>Processing necessary for:</i></p> <p>(a) a task carried out in the public interest or in the exercise of official authority vested in EFSA <input checked="" type="checkbox"/></p> <p>(b) compliance with a legal obligation to which EFSA is subject <input type="checkbox"/></p> <p>(c) performance of a contract with the data subject or to prepare such contract</p>

	<input type="checkbox"/>
(d) The data subject has given consent (ex ante, explicit, informed)	<input type="checkbox"/>
<i>Further details on the legal basis:</i>	
The processing is necessary for the performance of a task carried out in the public interest as mandated by EFSA's Founding Regulation (EC) No 178/2002	

5) Description of the categories of data subjects (Article 31.1(c))	
<i>Whose personal data are processed?</i>	
EFSA statutory staff	<input type="checkbox"/>
Other individuals working for EFSA (consultants, trainees, interims, experts)	<input type="checkbox"/>
Stakeholders of EFSA, including Member State representatives	<input checked="" type="checkbox"/>
Contractors of EFSA providing goods and services	<input type="checkbox"/>
The general public, including visitors, correspondents, enquirers	<input checked="" type="checkbox"/>
Relatives of the data subject	<input type="checkbox"/>
Other categories of data subjects (please detail below)	<input type="checkbox"/>
<i>Further details concerning the data subjects whose data are processed:</i>	
EFSA stakeholders and any person concerning by the specific subject matter of a Public Consultation launched by EFSA.	

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 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 checked="" 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:

- Name, affiliation, address incl. e-mail of the respondent to an EFSA Public Consultation
- The respondent's contribution on the subject matter of the Public Consultation.

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 type="checkbox"/>

Staff of EFSA units and services competent for the subject matter of the Public Consultation launched and their superiors.
Contributions and comments are made public in their original form without delay after the closing date of the consultation and may be reused by EFSA in a different context.
Contributions submitted by individuals in a personal capacity are published indicating the author's first and family name, unless the respondent has requested anonymity.
Contributions submitted on behalf of an organisation are attributed to the organization in question.

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"/>

The organisation of EFSA Public Consultations is supported by EFSA's Relationship Management system 'Connect.EFSA' based on the cloud-based (SaaS) platform provided by <https://www.salesforce.com/> CRM software. The provision of the Salesforce CRM services may entail the transfer of personal data outside the European Union, by Salesforce, its affiliates or its sub-processors of the data. A '[Data Processing Addendum](#)' (DPA) forms part of EFSA's subscription to the Salesforce CRM (see below point 9), 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.

9) Technical and organisational security measures (Article 31.1(g))

How is the data stored?

- On EFSA's Document Management System (DMS)
- On a shared EFSA network drive or in an Outlook folder
- In a paper file
- 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:

The EFSA Public Consultation process is supported by EFSA's Relationship Management system 'Connect.EFSA' based on the cloud-based (SaaS) platform provided by <https://www.salesforce.com/> CRM software. A data protection compliance check was carried out based on the contract documents of the Salesforce service provider. 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. Salesforce data centres for storage of EFSA data are located in Germany and France. There are no systematic data transfers outside the European Economic Area.

10) Retention period (Article 4.1 (e))

The outcome of each EFSA Public Consultation is made public, including personal data of the respondents (see above point 7) in conjunction with the publication of the relevant EFSA scientific output. The data is retained for an undetermined period.

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 EFSA Public Consultation process 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, as well as specific statement on EFSA Public Consultations is available in the entry point to the tool on the EFSA website - <https://connect.efsa.europa.eu/RM/s/termofuse>

Last update of this record: 03/08/2021

Reference: DPO/COM/4