

Eurofound's Customer Relationship Management (CRM) Database Background information

How is my data processed by CRM?

- Contact details of users are entered manually into Eurofound's (Microsoft Dynamics) CRM system (hereinafter referred to as 'CRM') either by Eurofound staff or by the user him/herself via the web interface. Only staff responsible for maintaining stakeholder (core) contacts (e.g. Management Board Members) has editing rights in relation to those contacts.
- All other staff, as identified in Eurofound's Microsoft Active Directory, has editing rights to manage all other contacts in accordance with CRM practice and guidelines.
- Contact details may be gathered from publicly available lists, such as those relating to Members of the European Parliament and European Commission officials, through direct contact with Eurofound staff by email, telephone or through face-to-face meetings.
- Where a new contact is entered into the CRM by Eurofound, the user will receive an email to indicate that Eurofound would like to include them in its contact database. This email informs the user of this intention and provides a hyperlink to lead him/her through to a variety of options including the possibility to decline the invitation or, if the user agrees to be included in the CRM, to provide full contact details, state areas of interest and subscription preferences. It is only upon explicit agreement of the user to be included in the system that the contact would become part of marketing lists for the provision of targeted Eurofound information.
- Stakeholder contacts –'core contacts'– are under constant review to ensure accuracy of data. An internal review of all these contacts is carried out at six-monthly intervals and a formal outreach to all contacts is carried out via email annually in April to ensure continued agreement with being held in Eurofound's CRM database and to verify contact data. This formal outreach approach applies to all contacts held within the CRM system.
- In addition to the data processes mentioned above, when users are contacted through CRM, they are given the opportunity to review their data and information preferences through the prompt of pop-up messages and links to edit data including a link to the data protection policy which appears as a footer in all correspondence.

Processing of personal data in Eurofound's CRM database

1. Introduction

Personal data collected by Eurofound from contacts or subscribers registered within its CRM are processed in accordance with Regulation (EU) 2018/1725 of the European Parliament and of the Council 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 data¹.

Data collected in the CRM relates to contact information of corporate relevance. The Directorate, supported by the Information and Communication (IC) Unit and more specifically the Promotions Team working in that Unit, is responsible for the overall management and strategic development of the CRM policy, strategy and systems at Eurofound. The Information Technology (ICT) Unit ensures the proper functioning and upgrading of the CRM software supporting the customer relationship management policy. The controller of the personal data processing operations is the Head of the IC Unit. The Eurofound team processing the personal data is primarily the Promotions Team which operates as part of the IC Unit.

2. Why do we process your personal data?

The CRM is used for the targeted dissemination of Eurofound research findings/data, for managing subscriptions, events and visits and for external communications in line with the aims outlined in Regulation (EU) 2019/127 of the European Parliament and of the Council of 16 January 2019 establishing the European Foundation for the improvement of living and working conditions (Eurofound), and repealing Council Regulation (EEC) No 1365/75² (hereinafter referred to as 'Eurofound's Founding Regulation').

Eurofound has identified categories of contacts as useful and relevant in achieving its overall goal of assisting policymakers and decision-makers in their efforts to improve living and working conditions across Europe. These categories comprise stakeholders, target groups and information users as follows:

- Eurofound stakeholders are defined as 'core contacts' and include members of its Management Board, Executive Board and Advisory Committees. In addition, specific stakeholder groups include, but are not limited to, relevant Committees of the European Parliament, relevant contacts within the European Commission including, more specifically, the Directorate-General for Employment, Social Affairs and Inclusion and European Commission Committees such as the Employment Committee (EMCO) and the Social Protection Committee (SPC), contacts at the European Economic and Social Committee (EESC), the Committee of the Regions (CoR) and the European 'sister' Agencies, i.e. FRA, EIGE, EU-OSHA, ETF and CEDEFOP. All of these groups are deemed to have an inherent interest in, and influence on, the activities and governance of Eurofound as well as in the policy sphere at European level and across the EU Member States.

¹. *OJ L 295 21.11.2018, p. 39–98.*

². *OJ L 30, 31.1.2019, p. 74–89.*

- Target groups are primarily EU and national-level decision-makers in the social and work-related domain whose work is benefitted by Eurofound's research data and information.
- Information users are defined as informed members of the general audience who have an interest in the areas of observation covered by Eurofound.

Personal data are processed solely for the purposes described above and not further processed in a manner that is incompatible with those purposes (e.g. marketing purposes).

3. What is the legal basis for processing your personal data?

Personal data processing, in as far as it concerns Eurofound's 'core stakeholders', is based on Articles 1 and 2 of Eurofound's Founding Regulation and is, therefore, lawful under Article 5(a) of Regulation (EU) 2018/1725 since it is necessary for the performance by Eurofound of its task to foster the exchange of information and experience between the governments, the social partners, policy makers and other stakeholders in the fields identified in the above-mentioned provisions of Eurofound's Founding Regulation.

Processing of personal data of all other contacts ('target groups' and 'information users') who have an interest in the areas of observation covered by Eurofound and have voluntarily chosen to be added to the CRM database is lawful under Article 5(d) of Regulation (EU) 2018/1725 on the basis of the unambiguous consent of the data subjects.

4. Which personal data do we collect and process?

- The following personal data are collected:
 - Contact details including name, address (business), organisation, telephone number and email address (business and/or private), job title.
 - Users are classified according to 'professional details' (e.g.: researcher, CEO, EU official, expert) and 'contact type' (e.g.: stakeholder (core), target group or information user). As applicable, this may be further extended to indicate where a user is a member of Eurofound's Management Board, its Executive Board or its Network of Eurofound Correspondents (NEC).
- In addition, the user is invited to add information about their interest areas and project involvement, event participation, subscription and contact preferences.
- The CRM system also collects data completed by visitors on certain forms on our website e.g. the subscription management forms, publication alerts, certain event interest registrations and SAI sign up pages.
- The CRM system also logs information where the data subject has received and/or opened an email sent and clicked on any of the links contained in that email (and which link). This information is traceable at individual level. However, data is mainly used in aggregate form with the aim of enhancing user experience and allowing Eurofound to collect statistical data on related email campaigns. . At present, Eurofound's CRM system does not have an integrated Outlook client which means that there is no view or storage of the content of emails.

5. How long do we keep your personal data?

Contact information is kept until the user decides to unsubscribe from the CRM system. However, user accounts are deleted after a defined period of 6 months inactivity (e.g. no subscriptions, no opening of e-mails).

By reason of term and role in Eurofound activities, the following categories of user accounts are deleted when they have been inactive for **5 years**:

- former Management Board members,
- correspondents from the Network of Correspondents

User accounts for stakeholders who are ‘core contacts’ and correspond to individuals in official posts are reviewed and retained in line with the period of service related to that post i.e. 5 years for MEPs and European Commissioners.

6. Who has access to your personal data and to whom is it disclosed?

Personal data are not disclosed to any third parties. Personal data entered by a user can be viewed and edited by Eurofound staff members via the CRM as described above. The Promotions Team, which operates as part of the IC Unit, is responsible for monitoring the data entered by users using views and the CRM audit functions.

7. How do we protect and safeguard your personal data?

Eurofound has in place several security controls to protect personal data from unauthorised access, use or disclosure. Data contained in CRM is stored locally in Eurofound premises in the ICT server room which is protected by a lock pad and access code only accessible by 2 ICT staff members and may be processed only by staff members who are delegated to handle the contact data stored in the Agency database.

An internal policy, ‘User policy: Customer Relationship Management’, clarifies for Eurofound’s staff members how professional data and information about Eurofound’s stakeholders, target audiences and information users are best collected, managed and used.

In addition, an internal strategic policy, ‘Strategy for Customer Relationship Management’ defines the establishment of a common software platform in Eurofound to ensure better sharing of critical information and data.

To allow better management of its communication activities, Eurofound makes use of an external ‘cloud’ service provider, ClickDimensions. This cloud service allows mass emailing and collection of statistical information, for example it provides information regarding the correct sending of the e-mail; whether the recipient opened the e-mail or deleted it, etc. The cloud service provider’s data centre is based in Europe. However, the information is stored in the CRM application hosted at Eurofound’s premises and not in the cloud. Eurofound uses the statistical information in an aggregate format. For more information on the processing of data by ClickDimensions please follow [this](#) link. You may find answers to common questions about ClickDimensions security [here](#).

8. Do we transfer any of your personal data to third countries or international organisations (outside the EU/EEA)?

No personal data is sent to a third country or an international organisation outside the EU/EEA in the context of this processing activity.

9. Does this processing involve automated decision-making, including profiling?

No decision is taken by Eurofound in the context of this processing activity solely on the basis of an automated processing of your personal data.

10. What are your rights as a data subject?

According to Regulation (EU) 2018/1725, you are entitled to access your personal data and to rectify it in case the data is inaccurate or incomplete. If your personal data is no longer needed by Eurofound or if the processing operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data is lawfully processed, you may ask the controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the controller holds on you and to transfer it from one controller to another. Where technically feasible, Eurofound will do this work for you.

If you wish to exercise your rights, please contact the Head of the IC Unit by sending an e-mail to subscriptions@eurofound.europa.eu.

You can also access your account at any time via your log-in and password and modify your data accordingly. You can request the deletion of your account once logged on and Eurofound will address such requests within 15 working days from receipt of the request.

As outlined above, in April each year an email is sent to all database users allowing them to amend and review their information preferences. It also provides users with the possibility to unsubscribe from CRM-related services such as newsletters, thus to delete their accounts.

You may always submit queries, remarks or complaints relating to the processing of your personal data to Eurofound's Data Protection Officer (DPO) by using the following e-mail address: dataprotectionofficer@eurofound.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: edps@edps.europa.eu.