

## PRIVACY STATEMENT REGARDING THE PROCESSING OF PERSONAL DATA THROUGH EUROFOUND'S ANNUAL USER FEEDBACK SURVEY

### 1. Introduction

You are being invited to take part in this feedback survey as part of Eurofound's efforts to further improve its products with the aim of increasing the relevance and utility of the Agency's work for its users.

This survey is managed by Eurofound (the Data Controller)<sup>1</sup>. It is carried out by ICF<sup>2</sup>, a research and evaluation consultancy, acting as the Data Processor, under the responsibility and on behalf of Eurofound with regard to the processing of personal data.

For the purpose of this questionnaire, ICF uses Voxco<sup>3</sup>, a specialised online survey application which only processes data insofar as strictly necessary for the technical operation of the survey (e.g. processing survey responses).

Your personal data will be processed strictly in accordance with the applicable data protection law, namely Regulation (EU) 2018/1725 ('EDPR')<sup>4</sup> and Regulation (EU) 2016/679 ('GDPR')<sup>5</sup>.

Participation in this questionnaire is voluntary. You can discontinue participation at any time or refuse to answer any question without consequence of any kind and without giving a reason. Before you decide to participate, it is important to understand why the questionnaire is being conducted and what your participation will involve. Please take the time to read the following information carefully. Contact ICF's survey team if there is anything that is not clear or if you would like more information.

### 2. Why do we process your personal data?

The aim of this survey is to get your views on the content produced by Eurofound and how it can be improved in the future to best suit your information requirements.

The questionnaire covers the following sections:

- **Screener questions:** these questions will help us understand how you use Eurofound's content.
- **Profiling:** these questions help us gain insight in the type of work that you do, your information needs and preferences.
- **Content and overall satisfaction:** the questions in this section cover the content and information produced by Eurofound and provides you with an opportunity to share your opinion and helps us provide insight into your levels of satisfaction with Eurofound's content.

<sup>1</sup> For more information, please visit [www.eurofound.europa.eu](http://www.eurofound.europa.eu).

<sup>2</sup> For more information, please visit [www.icf.com](http://www.icf.com)

<sup>3</sup> Voxco is to be considered a sub-processor of ICF. For more information, please visit <https://www.voxco.com/>

<sup>4</sup> 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC, OJ L 295, 21.11.2018, p. 39-98.

<sup>5</sup> Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), OJ L 119, 4.5.2016, p. 1–88.

- Communications preferences: the questions in this section are about the channels you use to access Eurofound information and your preferences for the future.
- Outlook to the future: In this final section, question asks you about Eurofound's current and future strategies. Eurofound's remit is to provide knowledge to assist in the development of better social, employment and work-related policies. Your input will help us gain insight into the relevance of Eurofound's current and future strategies for you as a user.

Your personal data will be processed only for the purposes identified above. ICF will use the results of the questionnaire to capture available evidence and better understand progress and emerging lessons. ICF and Voxco will not:

- disclose your personal data to other third parties;
- treat your data individually, but analyse it only in an aggregated form (i.e. anonymously); and
- publish or disclose your personal data to any party other than Eurofound.

### **3. Under which legal basis we process your personal data?**

Eurofound's performance in relation to its objectives, mandate and tasks must be evaluated on a regular basis, in accordance with Article 28 of Regulation (EU) 2019/127 ('Eurofound's Founding Regulation')<sup>6</sup>. Therefore, the processing of your personal data is necessary for the compliance with a legal obligation to which Eurofound is subject<sup>7</sup>.

As the processing of personal data is not based on your consent, please note that even if you decide to withdraw your participation from this survey, the withdrawal will not impact the processing of your personal data.

### **4. Which personal data do we collect and process?**

Eurofound will provide ICF with the following personal data:

- Name (first name, last name); and
- E-mail address.

Additionally, the survey software collects cookies<sup>8</sup>, as well as the email and names.

This data will be stored by ICF using Voxco's online platform and not transferred to Eurofound. During fieldwork, while the survey is open for responses, survey responses can be linked to individuals, but all personal information will be removed as soon as the email campaign is complete and completely and irreversibly anonymised before full analysis of the results. As such, it will not be possible to, directly or indirectly, identify you from the results.

### **5. How long do we keep your personal data?**

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<sup>6</sup> 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 1365/75, OJ L 30, 31.1.2019, p. 74–89.

<sup>7</sup> Article 5(1) (b) of the GDPR.

<sup>8</sup> You can refuse the usage of cookies by adjusting the privacy setting in your browser. This may limit some of the functionalities of the survey, e.g. storing your answers to return to them later. For more information on cookies, please read <https://www.voxco.com/cookie-policy/> and <https://www.aboutcookies.org/>

Your personal data will remain in ICF's database until the results of the survey have been completely analysed and usefully exploited (i.e. until 31 January 2021 at the latest), after which it will be securely destroyed. Anonymised results (i.e. aggregate results) will be kept for a longer period of time<sup>9</sup>.

#### **6. How do we protect and safeguard your personal data?**

Responses will be analysed by ICF in an anonymous and aggregate manner. ICF operates in accordance with its Privacy Policy which can be found [here](#).

The collected personal data and all information related to the above-mentioned consultation will be stored on secured and protected servers of Voxco located in the EU. Voxco implements appropriate technical and organisational measures to ensure a level of security and confidentiality appropriate to the risk. You may read Voxco's Privacy Policy [here](#).

#### **7. Who has access to your personal data and to whom is it disclosed?**

Access to all personal data and information collected in the context of this questionnaire is only granted through UserID/Password to research team members of ICF. No data is transmitted to parties which are outside the recipients mentioned. Aggregate results will, however, be transmitted to Eurofound's staff members allocated to the Organisational Support Unit.

Neither Eurofound, nor ICF will sell or share personal data with third parties for (direct) marketing purposes.

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

None of your personal data processed for the purposes above identified will be transferred to third countries or international organisations outside the EU/EEA.

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

While the survey includes a section on profiling (in relation to the type of your work), this does not involve any processing of your personal information. We will use your responses to the survey questions in order to create profiles of the different requirements Eurofound's stakeholders have, but this does not entail use of any information which can identify you personally.

#### **10. What are your rights as a data subject and how can you exercise them?**

According to the data protection rules, and under certain limits, you are entitled to access, rectify, erase and/or port your personal data, as well as to restrict or object to the processing of your personal data. The exercise of rights is free of charge. If your request is manifestly unfounded or excessive, Eurofound may refuse to act on it.

If you wish to exercise your rights, feel free to contact Eurofound by using the following e-mail address: [Anna.Gallinat@eurofound.europa.eu](mailto:Anna.Gallinat@eurofound.europa.eu). Alternatively, you may contact ICF's support team at: [dataprotection@icf.com](mailto:dataprotection@icf.com).

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<sup>9</sup> Anonymised data is not considered personal data and, therefore, is not subject to retention restrictions set forth in data protection law.

Should you feel that the processing infringes the GDPR, you are entitled to raise a complaint with the European Data Protection Supervisor ([https://edps.europa.eu/data-protection/our-role-supervisor/complaints/edps-complaint-form\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints/edps-complaint-form_en)).

Finally, 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](mailto:dataprotectionofficer@eurofound.europa.eu).

Thank you for reading this privacy statement and for considering taking part in this questionnaire.