



Data Protection Notice¹

Communication Campaign in India / “More than Food India” / 2023-2026

Based on the Regulation 2018/1725² (hereinafter the Regulation²), the European Research Executive Agency (‘REA’) collects and processes your personal data necessary for the organisation and management of the promotion campaign in India (hereinafter ‘the Campaign’) implemented in India from 2023 to 2026 and organised by the UnitB-4 Agri-Food promotion, Environmental Observation and Innovative Governance at REA. REA uses external contractors to organise and manage related activities.

The Campaign website more-than-food-india.campaign.europa.eu and the social media accounts Facebook @morethanfoodind, Twitter @morethanfoodind, and Instagram @morethanfoodind are our most important communication tools. Here, we communicate about our work, such as the events and activities that are part of the Campaign. Some of the services offered on certain pages of these tools require the processing of your personal data, such as the “contact form” page.

The different events and activities that are organised under the Campaign will have their own specific data protection notices.

1. WHY DO WE COLLECT YOUR PERSONAL DATA?

The purpose of this processing operation is the promotion of European agricultural products in **India** through the provision of relevant information in the form of the newsletters and direct mailing thus not to share information containing personal data.

For this, identification data are processed for the purposes of managing the Campaign and inviting you to related activities (events, social media channels engagement,. Their promotion and organisation include collection and processing of data for the following activities:

- to be included in the contact list;
- to send invitations to events, notifications, event follow-up or newsletters;
- to prepare and send reports;
- to distribute anonymous evaluation forms;

¹ **(Instructions for using this General DPN:** Select your data processing activities / purposes from the lists (options between [...]) and add further as appropriate. Each data processing operation needs to be carefully assessed and the DPN adapted accordingly in case more information than the one that is provided is needed. **You do NOT need to detail every event data protection information here as the Campaign events will have their own DPN.** Same for the website cookies, it is a separate clickable link. For the acceptance of this DPN add this compulsory opt-in for registration: “ I have read and agree to the data protection notice”.

Cursive text is explanatory and should be deleted for the final version, after taking it into account. Please also delete this footnote.)

² Regulation 2018/1725 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 of 21 November 2018).

- to collect feedback on evaluation;
- to promote activities linked to the events;
- to publish on the websites of REA / the European Commission (EC);
- to manage REA social media channels to engage people about the Campaign.

2. WHO IS RESPONSIBLE FOR THIS PROCESS?

The controller is the European Research Executive Agency (REA), represented by its Director. For organisational reasons, the role of the data controller has been entrusted by the Director to the delegated controller and is exercised by the Head of Unit of REA.B4 ‘Agri-Food promotion, Environmental Observation and Innovative Governance’.

The delegated controller may be contacted via the following e-mail address: REA-AGRI-EVENTS@ec.europa.eu

The following entity/ies process your personal data on our behalf:

GOPA COM., Avenue de Woluwe, 2 1050 Brussels, Belgium (the contractor) with email address info@gopacom.eu and its approved Consortium partner Edelman India Private Limited that can be contacted at query.morethanfood@edelman.com.

3. WHAT IS THE LEGAL BASIS TO COLLECT YOUR DATA?

This processing activity is based on:

1. Article 5(1)(a) of the Regulation, it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in REA based on the legal acts³.

2. Article 5(1)(d) of the Regulation based on the data subject explicit consent for the following specific purposes⁴:

- to be included in the mailing lists produced to dispatch of anonymous questionnaire for the evaluation of the Campaign and its activities;
- to be included in the mailing lists to receive relevant information concerning the promotion of agricultural products in the form of the newsletters and direct mailing;
- to be included in the mailing lists to receive invitations to future similar activities that REA may organise;
- to be included in the mailing lists for being contacted in the context of the EU activities related to the promotion of EU agricultural products.

You have the right to withdraw your consent at any time, without affecting the lawfulness of the processing before the withdrawal of your consent.

4. WHICH PERSONAL DATA ARE COLLECTED?

³ Council Regulation (EC) No 58/2003 of 19 December 2002, OJ L 11, 16.1.2003; **REA Establishment Act**: Commission Implementing Decision (EU) 2021/173 of 12 February 2021; **REA Delegation Act**: Commission Decision C(2021)952 of 12 February 2021; and **Regulation (EU) No 1144/2014** of the European Parliament and of the Council of 22 October 2014.

⁴ *(One tick for a whole DPN is not enough. One tick for all points under explicit consent art.5.1.d. is fine. In practice, in the ‘contact form’ please list all the points (as applicable) under art 5.1.d and have one tick to agree to all of them. Therefore, in the contact form there would be separate ticks for: consent to this DPN and consent to art. 5.1.d. (if applicable). Please add the opt in box in the registration form (contact form) or provide a consent form to be sent back for each of the purposes under art. 5.1.d.)*

The personal data processed in the framework of the Campaign are:

Identification data⁵:

- [First name;
- Last name;
- Salutation
- City
- Country of residence
- Position;
- Organisation;
- E-mail address]

The data are collected via email exchange or the on-line contact form (you may give specific consent by ticking the relevant opt-in boxes) / newsletter. In case we have contacted you directly, we have received your data from publicly available sources. ⁶

5. WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

Access is always on a need-to-know basis.

a. WHO WILL HAVE ACCESS TO THE DATA WITHIN REA?

Authorised staff of the REA B4 Unit ‘Agri-Food promotion, Environmental Observation and Innovative Governance’ responsible for the organisation and management of the Campaign will have access to your personal data.

b. WHO WILL HAVE ACCESS TO THE DATA OUTSIDE REA?

The following categories of individuals will have access to your personal data for the Campaign:

- Authorised staff of external contractors, as listed in section 2, and its local subcontractors if foreseen for organisation purposes;
- Authorised staff of the European Commission or of other institution, agency or body co-organising or involved in the Campaign for organisation purposes;
- Authorised staff of the European Commission for policy purposes;

Your personal data might be transferred to **India**. The international transfer is governed and lawfully justified by Chapter V of the Regulation. The following safeguards are in place for this transfer:

- The collected personal data and all information related to the event are stored on the servers of REA/EC and the servers of its external contractors, as listed in section 2, / partners;
- The data recipients are located in a third country covered by an Adequate Decision of the Commission; https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en
- The data recipients use standard contractual clauses / binding corporate rules / a derogation;
- REA cooperates with a third country’s public authority or an International Organisation based on existing legislation / agreement etc. (

⁵ (For online or video conferences the following data may be collected- to be added as necessary: IP address, geolocation, and browser, generated information, cookies or other technologies used to analyse users’ activity.)

⁶ Sources include the Forum of Indian Food Importers (FIFI) network and interactions with the campaign social media platforms.

- the data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards⁷;

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The Campaign lasts **3 years**. We keep your personal data for as long as follow-up actions to the Campaign are necessary, for invitation to our activities and its evaluation⁸. All personal data will be deleted from databases after the last action in relation to the Campaign and maximum 1 year after its end.

Personal data shared with selected contractors for organisational purposes is retained during the Campaign period and will be erased by the contractors in accordance with the corresponding contractual obligations and provisions.

Reports containing personal data will be archived according to REA's legal framework.

7. WHAT ARE YOUR RIGHTS?

You have the right to withdraw their consent at any time, without affecting the lawfulness of the processing before the withdrawal of your consent.

You may have access to your personal data and may exercise your right of information / access / rectification / erasure / restriction / data portability / objection / withdrawal of consent by contacting the delegated data controller at: REA-AGRI-EVENTS@ec.europa.eu

Any request from a data subject to exercise a right will be dealt within one month from receipt of the request. This period may be extended pursuant to Article 14(3) of Regulation.

Your right to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or due to confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the [applicable Restriction Decision](#) in accordance with Article 25 of Regulation.

Attention is drawn to the consequences of a delete request, which means that all your contact details will be lost.

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

8. CONTACT INFORMATION

In case you have any questions about the collection/processing of your personal data, you may contact the data controller who is responsible for this processing activity:

European Research Executive Agency
Unit REA.B.4. SB34 / 10,
B-1049 Brussels/Belgium
Email: REA-AGRI-EVENTS@ec.europa.eu

⁷ Option to be analysed on a case-by-case basis and to be used only exceptionally. It requires that data subjects to be duly informed of the possible risks of such transfers.

⁸ To use the Common Commission-Level Retention List for European Commission File for the retention periods or – if not foreseen by it, the agreed retention time up to 5 years. If selected period is shorter, ensure deletion / anonymisation of the data before the end of the FwC.

Further to the above, the following instances can be addressed:

REA Data Protection Officer (DPO): REA-DATA-PROTECTION-OFFICER@ec.europa.eu

In case of conflict, complaints can be addressed to the European Data Protection Supervisor:
EDPS@edps.europa.eu