

(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 29/11/2017

CASE NUMBER: 2017-1052

INSTITUTION: ECB

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN

1/ NAME AND ADDRESS OF THE CONTROLLER

EUROPEAN CENTRAL BANK
MICHAEL STEEN
HEAD OF DIVISION
DIRECTORATE GENERAL COMMUNICATIONS/GLOBAL MEDIA RELATIONS DIVISION
SONNEMANNSTRASSE 20
60314 FRANKFURT AM MAIN

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

Directorate General Communications (DG/C), Global Media Relations Division (GMR Division).

3/ NAME OF THE PROCESSING

Analysis of personal data during the different stages of the social media monitoring procedure.

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The ECB intends to procure a digital tool (off-the-shelf) to facilitate following the debate about the ECB in social media (Twitter, Facebook, etc.) conducted by the Media Monitoring and Analysis team. The purpose of the monitoring and analysis is to collect information about the themes, sentiment and the opinions related to the discussion of ECB topics. The processing of the data also aims at collecting information about the reputation of the ECB in social media.

¹ OJ L 8, 12.01.2001.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Only publicly available data from posts by authors that have agreed to the terms and conditions of the social media providers will be processed and analysed. The tool will be configured to monitor specific topics and times, the initiators of posts/tweets, as well as sentiment and reach of social media posts (number of likes, shares, etc.).

The monitoring and analysis will be conducted with aggregated data as produced by the tool, with some exceptions. In case of so called “influencers”², the analysis might also focus on single tweets or posts. Whether a poster/tweeter is considered an “influencer” is determined by the algorithm of the tool which can only be partially influenced by the ECB. For instance, single tweets or posts originating from such influencers could be “quoted” in an analysis.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

Personal opinions of users on ECB-relevant topics published in the following social media channels:

- Twitter, Facebook, Instagram, YouTube, LinkedIn, Google+, Flickr
- Other online sources such as forum blogs and publicly accessible online news websites

User activities regarding the ECB’s own media channels including at least its website, Twitter account and YouTube channel.

Personal data affected will be the **content of each post and its authorship**. The following categories will be analysed:

- a) The volume of coverage (aggregated data)
- b) Sentiment (aggregated data)
- c) Topics (aggregated data)
- d) Engagement (aggregated data) (amount of likes, favourites, comments, shares of users on a specific topic)
- e) Reach
- f) Influencers (Information about the influence of users and sources, such as the number of posted items, their posts’ sentiment, their reach and popularity)
- g) Contributors’ demographics (aggregated data) (Indicators of user demographics such as native language, country of origin and gender)
- h) Date and time of posts to see development over time (aggregated data)

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

Information to be provided on the ECB website about the monitoring activity targeted at social media, along the following lines: “*The ECB monitors activity related to topics covering its tasks in*

² Influencers may be defined as ‘everyday, ordinary internet users who accumulate a relatively large following on blogs and social media through the textual and visual narration of their personal lives and lifestyles, engage with their following in digital and physical spaces, and monetise their following by integrating “advertorials” into their blog or social media posts’, Abidin, C., ‘Communicative Intimacies: Influencers and Perceived Interconnectedness’, *Ada: A Journal of Gender, New Media, and Technology*, issue 8, 2015, p. 29. In the ECB context, influencers would also be journalists or economists who follow the ECB regularly and publish about the ECB also outside of social media and as such form part of the core “ECB watchers.”

social media and related to the use of its own social media channels. Personal data of social media users might be collected if users comment on ECB related topics, or use the ECB's own media channels."

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

In line with the provision of Article 20 (2), no specific procedures are foreseen given that the sole purpose of the processing is to compile statistics, and that personal data will not be kept longer than necessary for this purpose.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Both automated and manual processing takes place. Searches are initiated by ECB staff and operated through the algorithms supplied by the provider in the tool. Searches will be done on *ad hoc* and need to know basis, for instance with the aim of understanding how the ECB press conference and monetary policy decisions have been discussed in social media.

The searches will be done by automatic means using the procured tools for social media analysis (specified platform browser-based). The initiation of the search and later analysis and use of the results will be manual.

10/ STORAGE MEDIA OF DATA

Personal data analysed will not be stored, only the reports containing aggregated data and individual quotes.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

The purpose of this processing is monitoring the perception of ECB's communication and its reputation in the social media. Communication has increasingly played an important role in ensuring effectiveness and efficiency of fulfilment of ECB tasks (e.g. forward guidance related to monetary policy or statements regarding policy intentions to influence/stabilise/anchor economic agents' expectations related to future ECB action) and has even been called an additional monetary policy tool. In addition, careful calibration of messages requires having at the ECB's disposal a feed-back loop, providing up-to-date and detailed information on perceptions and opinions. Therefore, this processing is necessary for the performance of the tasks entrusted to the ECB as stipulated in the Treaty on the Functioning of the European Union (Article 3 of Protocol No 4 on the statute of the European System of Central Banks and the European Central Bank). The legal basis for the processing is therefore Art 5 (a) of Regulation 45/2001.

Furthermore, the data collected and processed is only publicly available data from posts by authors that have agreed to the terms and conditions of the social media providers. Thus, the processing of the data can be also based on the implicit consent of the data subjects (Art. 5 (d) of Regulation 45/2001).

As an example of the consent the data subject have signed when engaging in activities with social media, Twitter states in its [Terms of Service](#) that "*You should only provide Content that you are*

comfortable sharing with others. [...] By submitting, posting or displaying Content on or through the Services, you grant us a worldwide, non-exclusive, royalty-free license (with the right to sublicense) to use, copy, reproduce, process, adapt, modify, publish, transmit, display and distribute such Content in any and all media or distribution methods (now known or later developed). This license authorizes us to make your Content available to the rest of the world and to let others do the same. You agree that this license includes the right for Twitter to provide, promote, and improve the Services and to make Content submitted to or through the Services available to other companies, organizations or individuals for the syndication, broadcast, distribution, promotion or publication of such Content on other media and services, subject to our terms and conditions for such Content use. Such additional uses by Twitter, or other companies, organizations or individuals, may be made with no compensation paid to you with respect to the Content that you submit, post, transmit or otherwise make available through the Services.”

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

- For raw data: communication specialists from GMR division
- For the reports elaborated using the results of the described processing: other DG C staff on a need-to-know basis, members of the ECB Executive Board, ECB senior management, ECB Chief Services Officer.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

See Box 10

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

(Please, specify the time limits for every category, if applicable)

No specific time limits apply.

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

The main purpose is the compilation of statistical data as explained in the previous boxes.

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

Not applicable.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING *(PLEASE DESCRIBE)*

As Foreseen In:

☐ Article 27.2.(a)

(Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,)

☐ Article 27.2.(b)

(Processing operations intended to evaluate personal aspects relating to the data subject,)

☒ Article 27.2.(c)

(Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,)

☐ Article 27.2.(d)

(Processing operations for the purpose of excluding individuals from a right, benefit or contract)

☒ Other (general concept in Article 27.1)

17/	COMMENTS
	Not applicable.

PLACE AND DATE: FRANKFURT, 29 NOVEMBER 2017

DATA PROTECTION OFFICER: BARBARA EGGL

INSTITUTION OR BODY: EUROPEAN CENTRAL BANK