

EDPS record of processing activity

Record of EDPS activities processing personal data, based on Article 31 of 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.

Nr.	Item	Description
		EDPS Spotify corporate account
1.	Last update of this record	14/06/2023
2.	Reference number	71
3.	Name and contact details of controller	<p>European Data Protection Supervisor (EDPS) Postal address: Rue Wiertz 60, B-1047 Brussels Office address: Rue Montoyer 30, B-1000 Brussels Telephone: +32 2 283 19 00 Email: edps@edps.europa.eu</p> <p>Responsible department or role: Information and Communication Unit. Email: PresseEDPS@edps.europa.eu</p> <p>Contact form for enquiries on processing of personal data to be preferably used: https://edps.europa.eu/node/759</p> <p>Spotify is a separate controller for the processing of personal data on which it determines the means and the purposes. For more information, please refer to the Spotify privacy policy available here: https://www.spotify.com/us/legal/privacy-policy/</p>



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4.	Name and contact details of DPO	dpo@edps.europa.eu
5.	Name and contact details of joint controller (where applicable)	
6.	Name and contact details of processor (where applicable)	EDPS does not employ any processor for this processing activity.
7.	Short description and purpose of the processing	<p>The purpose of the data processing is to share information about EDPS activities to the public and more specifically, to publish the EDPS podcasts on Spotify and to analyse outreach. The EDPS publishes podcasts on Spotify in order to regularly inform the public about its activities, raise awareness about data protection issues and promote content of public interest. EDPS podcasts can be accessed by Spotify users interested to listen to the audio recording.</p> <p>Citizens do not need to access Spotify in order to be able to listen to EDPS Podcasts. They are also available on the website, which is the EDPS' main platform used to communicate with the public. The public can also import the RSS Podcast feed from the EDPS website to their preferred app and software.</p> <p>Data gathered via Spotify is aggregated and used solely for statistical and analytical purposes, such as analysing the volume of audience (number of listeners, age, gender). Statistical data are provided in the form of graphics on a timeline. This statistical aggregated data helps the EDPS to improve its communication activities and to increase the quality of the service provided.</p>
8.	Description of categories of persons whose data the EDPS processes and list of data categories	<p>The EDPS only processes aggregated data (number of listeners, age and gender) of users of Spotify platform who accessed the podcasts.</p> <p>The EDPS processes the following personal data of speakers interviewed for EDPS podcasts:</p> <ul style="list-style-type: none"> • name; • bio (e.g. professional affiliation); • email address; • views provided by the interviewee during the podcast;



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		<ul style="list-style-type: none"> • audio / video recordings containing interviewees' voice / image.
9.	Time limit for keeping the data	<p>Personal data will be available on Spotify for as long as it is published on the EDPS account. The EDPS will only store aggregated and numeric values of performance measurement in order to be able to compare its performance over a maximum period of 10 years.</p>
10.	Recipients of the data	<p>Once personal data are uploaded online, it can be used by third parties for their own purposes, in their own platforms, and sometimes without the EDPS being informed.</p>
11.	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>Publishing the podcast will entail transfers of your personal data outside of the EU/EEA areas. According to Spotify's privacy policy¹, '<i>... Spotify shares your personal data internationally with Spotify group companies, subcontractors and partners ...</i>'. This may create additional risks, because there may be a lower level of protection in the non-EU/EEA country of destination. In particular Spotify mentions the risk that the data protection laws of the country(ies) of destination '<i>may not give you the same rights over your data.</i>' This may have an impact on the subject's ability to exercise their data protection rights. Another risk could be that the laws and practices of the non-EU/EEA country of destination may require to provide personal data to governmental agencies or permit access by such authorities.</p> <p>The EDPS is responsible for transfers of personal data of speakers interviewed for the podcasts. For transfers occurring outside of the EU/EEA the legal basis is article 50(1)(a) of the Regulation (EU) 2018/1725 ('<i>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 safeguards</i>').</p>
12.	General description of security measures, where possible.	<p>To protect personal data processed in this context, the EDPS has put in place the following measures:</p>

¹ <https://www.spotify.com/us/privacy>



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		<ul style="list-style-type: none"> • Access will be limited to EDPS staff who process personal data in order to prepare the podcast for publication and analyse aggregate statistics (number of listeners, age and gender). • EDPS Information Security Policy applies
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the data protection notice:	The Data Protection Notice is available on the EDPS website https://edps.europa.eu/data-protection/our-work/publications/data-protection-notice-records/2023-06-14-edps-spotify-corporate-account_en

