

RECORD OF PERSONAL DATA PROCESSING ACTIVITY according to Article 31 of Regulation (EU) 2018/1725

▶ External and internal communications activities (Europafest 2026)

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GENERAL INFORMATION

Introduction
EIOPA, as a European Authority, is committed to protect individuals with regard to the processing of their personal data in accordance with Regulation (EU) No 2018/1725 (further referred to as the "EUDPR") ¹ . For further information on the processing of personal data the Snapnext, the provider of the service, please refer to Snapnext's Privacy Statement .
Contact Details of Data Controller(s)
Damian Jaworski, Executive Director Westhafen Tower, Westhafenplatz 1, 60327 Frankfurt am Main, Germany datacontroller@eiopa.europa.eu
Contact Details of the Data Protection Officer
Alinde Terstegen-Verhaag Westhafen Tower, Westhafenplatz 1, 60327 Frankfurt am Main, Germany dpo@eiopa.europa.eu
Contact Details of Processor

¹ 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.

EIOPA's Team/Unit/Department responsible for the processing: Communications Team
Contact Details of External Processor(s) / Joint Controller(s) (<u>Note 3</u>)
<input checked="" type="checkbox"/> External processor(s): SnapNext GmbH & Co. KG Rommerskirchener Str. 21 Atelier 54 im Walzwerk 50259 Pulheim E-Mail: datenschutz@snapnext.de Contact Person: Maximilian Arbeiter, CEO <input type="checkbox"/> Joint controller(s): <input type="checkbox"/> N/A

DESCRIPTION AND PURPOSE OF THE PROCESSING

Description of Processing
EIOPA's Communications Team will carry out a number of activities, which involve processing of personal data, notably: Photographs in the framework of events: the Communications team will operate a photobox provided by Snapcube, a brand of Snapnext. This photobox offers visitors the opportunity to voluntarily have their photograph taken. Using AI-supported software, the photobox processes the image to generate an aged version of the user. On the day of the event, EIOPA Staff members will be present as volunteers and should they decide to have their photo taken, their photos may also be published with data subjects' explicit consent. Purpose of the processing activities listed above is to enable EIOPA to maintain relations with external stakeholders and public (external communication activities). Your data will not be used for any purposes other than the performance of the activities specified above. Otherwise you will be informed accordingly.
Purpose (s) of the processing

<input type="checkbox"/> Staff administration <input checked="" type="checkbox"/> Relations with external parties <input type="checkbox"/> Procurement and accounting <input type="checkbox"/> Administration of membership records <input type="checkbox"/> Auditing <input type="checkbox"/> Information administration <input type="checkbox"/> Other (please give details):
Lawfulness of Processing
<ul style="list-style-type: none">• Legal Basis justifying the processing: Regulation (EU) No 1094/2010 (EIOPA Regulation). Procedures on External Communications Activities (available on EIOPA's incidernet)• Processing is necessary: <input checked="" type="checkbox"/> for the performance of a task carried out in the public interest <input type="checkbox"/> for compliance with a legal obligation to which the Controller is subject <input type="checkbox"/> for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract <input type="checkbox"/> in order to protect the vital interests of the data subject or of another natural person Or <input checked="" type="checkbox"/> Data subject has given his/her unambiguous, free, specific and informed consent

DATA SUBJECT'S RIGHTS

Information on how to exercise data subject's rights
Data subjects may exercise their data privacy rights provided in Articles 17 to 24 of the Regulation (EU) 1725/2018. Data subjects have the right to: <ul style="list-style-type: none">• access their personal data, receive a copy of them in a structured and machine-readable format or have them directly transmitted to another controller, as well as request their rectification or update in case they are not accurate.• request the erasure of their personal data, as well as object to or obtain the restriction of their processing. For the protection of the data subjects' privacy and security, every reasonable step shall be taken to ensure that their identity is verified before granting access, or rectification, or deletion. Should data subjects wish to access/rectify/delete their personal data, or receive a copy of them/have it transmitted to another controller, or object to/restrict their processing, please contact communicationsteam@eiopa.europa.eu or dpo@eiopa.europa.eu .

Complaint:

Any complaint concerning the processing of the data subjects' personal data can be addressed to EIOPA's Data Protection Officer (dpo@eiopa.europa.eu). Alternatively, data subjects can also have at any time recourse to the European Data Protection Supervisor (www.edps.europa.eu).

Restrictions:

Without prejudice to the above, rights might be restricted in accordance with EIOPA's decision on the restriction of data subject's rights (EIOPA-MB-19-056). If restrictions are applicable, please complete below the legal basis and the purpose:

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CATEGORIES OF DATA SUBJECTS & PERSONAL DATA

Categories of Data Subjects

Photos of individuals may contain special categories of personal data (Art. 9 GDPR), such as ethnic origin, religious beliefs, or health-related information. Snapnext does not collect biometric data and does not conduct "profiling." All image data is used solely for the purposes described and is not further processed.

- EIOPA Temporary or Contract Agents
- SNEs or trainees
- Visitors to EIOPA (BOS, MB, WG, Seminars, Events, other)
 If selected, please specify:
- Providers of good or services
- Complainants, correspondents and enquirers
- Relatives and associates of data subjects
- Other (please specify):

Categories of personal data

- (a) General personal data:**
 The personal data contains:
- Personal details (name, address etc)
 - Education & Training details
 - Employment details
 - Financial details
 - Family, lifestyle and social circumstances
 - Other (please give details): picture of individuals face

(b) Special categories of personal data

The personal data reveals:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or Biometric data
- Data concerning health, sex life or sexual orientation

CATEGORIES OF RECIPIENTS & DATA TRANSFERS

Recipient(s) of the data
<ul style="list-style-type: none"> <input type="checkbox"/> Managers of data subjects <input checked="" type="checkbox"/> Designated EIOPA staff members <p style="margin-left: 20px;">If selected, please specify:</p> <p>Communications Team members; any relevant staff member on a need to know basis</p> <ul style="list-style-type: none"> <input type="checkbox"/> Relatives or others associated with data subjects <input type="checkbox"/> Current, past or prospective employers <input type="checkbox"/> Healthcare practitioners <input type="checkbox"/> Education/training establishments <input type="checkbox"/> Financial organisations <input checked="" type="checkbox"/> External contractor <input type="checkbox"/> Other (please specify):
Data transmissions and transfer(s)
<ul style="list-style-type: none"> <input type="checkbox"/> Other EU institutions/agencies/bodies <input checked="" type="checkbox"/> Other recipients within the EU (e.g. NCAs): Google Cloud Enterprise environment (Frankfurt) <input type="checkbox"/> To third countries <p style="margin-left: 20px;">If selected, please specify:</p> <p style="margin-left: 20px;">Whether suitable safeguards have been adopted:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adequacy Decision of the European Commission² <input checked="" type="checkbox"/> Standard Contractual Clauses (SCC) <input type="checkbox"/> Binding Corporate Rules (BCR)

² Third countries for which the European Commission has issued adequacy decisions are the following: Adequacy decisions (europa.eu)

<input type="checkbox"/> Administrative Arrangements between public Authorities (AA) <input type="checkbox"/> To international organisations If selected, please specify the organisation and whether suitable safeguards have been adopted:
Data subjects could obtain a copy of SCC, BCR or AA here:

AUTOMATED DECISION MAKING

Automated Decision-making, including profiling
A decision is taken in the context of this processing operation solely on the basis of automated means or profiling: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes In case of an automated decision-making or profiling, please explain:

RETENTION PERIOD & SECURITY MEASURES

Retention period
Snapnext's retention period is limited to twenty-fours (24) hours for all photos (original and AI-generated). This covers active storage, logs, caches, and backups. After this period, data is permanently deleted. No biometric profiles or long-term data are stored. Personal data included in publications, photos or video recordings published by EIOPA, may remain available on the internet indefinitely.
For further processing envisaged beyond the original retention period for historical, statistical or scientific purposes, please specify whether the personal data will be anonymised: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
Technical & organisational security measures taken
Several technical and organisational measures have been adopted in order to ensure the optimum security of the documents and personal data collected in the context of the procedures described under section 'Description and Purpose of the Processing'.
Security of Processing – detailed analysis

- Please indicate how and where the data processed are stored (e.g. Share Point / cloud):
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- Technical & Organisational Security measures adopted:
 - Controlled access to ICT-system/controlled access codes, the finalized images will be made available only to the individual participants with a personalized QR-code (see general description).
 - Restricted access to physical location where data is stored
 - Pseudonymisation and Encryption
 - Back-up
 - Audit trails
 - Confidentiality agreement/clause
 - Test the effectiveness of security measures adopted
 - Training of staff
 - Other (please specify):