



DATA PROTECTION NOTICE

EUAA Let's Speak Asylum (LSA) Portal

1. Introduction

The European Union Agency for Asylum (hereinafter 'the EUAA' or 'the Agency') is committed to protecting your privacy. The EUAA collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#)¹ (hereinafter 'the EUDPR').

This Data Protection Notice explains *inter alia* the reasons for the processing of your personal data, the way we collect, handle and ensure protection of your personal data and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, as well as of the Data Protection Officer (DPO) and the European Data Protection Supervisor (EDPS) to which you may have recourse as well to exercise the said rights.

2. Why and how do we process your personal data?

The EUAA Let's Speak Asylum portal (hereinafter 'the LSA portal') is a point of reference for methodological guidance and practical tools for information provision on the asylum procedure, the Dublin procedure, the various phases of the reception process and resettlement pathways. The portal aims to support the harmonised implementation of the Common European Asylum System (CEAS). It supports staff working in the field of information provision, designing communication and information provision activities and resources within administrations or organisations responsible for asylum and reception related activities.

The LSA portal also includes a database of EUAA information materials that have been developed by the EUAA and can be used to provide information to international protection applicants about different parts of the asylum and reception procedures. These include animations, posters, brochures, slide presentations etc. In addition, a number of illustrations and icons were designed by the EUAA to support providing information to applicants in a uniform and accessible manner.

The LSA portal also contains a library (repository) of information provision products (hereinafter 'the LSA Info Provision Library'), aiming to be a source of inspiration and help users of the portal to develop quality information materials. Each product is accompanied by a short description indicating which elements in particular can be used as sources of inspiration. This short description should not be read as a complete analysis. The LSA Info Provision Library is also not intended as an exhaustive collection of available information products. The products contained in the LSA Info Provision Library have been collected by the EUAA through surveys launched and shared with its thematic networks or through the Agency's own research.

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, OJ L 295, 21.11.2018, p. 39-98.





The LSA portal is publicly available at www.lsa.euaa.europa.eu. No accounts are necessary for accessing the said portal.

Your personal data are processed for the purpose of managing the EUAA's Let's Speak Asylum (LSA) Portal. More specifically, your personal data, as a user of the LSA portal, are processed for the purpose of allowing the EUAA to take follow-up actions in two situations where you may choose to voluntarily share your data with the Agency:

a) LSA Information Provision Library:

- Users of the LSA portal are invited to contribute to further build the LSA Info Provision Library (which can be accessed [here](#)) by sharing with the EUAA the information provision products that they have developed themselves and which showcase the use of one or more of the communication and information provision principles described in the LSA general methodology available [here](#) in view of referencing the relevant products in the said Library.
- Once an information provision product is (voluntarily) submitted using the online form available on the LSA portal, the EUAA will need to contact the concerned user, as explained in the [relevant page](#), before the said product can be added to the LSA Info Provision Library.

b) Contact us:

- Users of the LSA portal are invited to share with the EUAA any feedback or suggestions for improvements that they might have regarding the functionalities or contents of the said portal.
- Once feedback/suggestions are (voluntarily) submitted using the online form available on the LSA portal (accessible [here](#)) the EUAA may need to contact the concerned user for follow-up actions regarding the feedback and/or suggestions received. For example, the EUAA may need further information regarding technical issues reported by the user, or the EUAA may need to follow-up on an inquiry regarding how to use a specific EUAA information material.

3. On what legal ground(s) do we process your personal data?

We process your personal data on the basis of Articles 1(2) and (3) of [Regulation \(EU\) 2021/2303](#)² (hereinafter 'the EUAA Regulation') which read as follows:

"2. The Agency shall contribute to ensuring the efficient and uniform application of Union law on asylum in the Member States in a manner that fully respects fundamental rights. The Agency shall facilitate and support the activities of the Member States in the implementation of the Common European Asylum System (CEAS), including by enabling convergence in the

². Regulation (EU) 2021/2303 of the European Parliament and of the Council of 15 December 2021 on the European Union Agency for Asylum and repealing Regulation (EU) No 439/2010, OJ L 468, 30.12.2021, p. 1-54.



assessment of applications for international protection across the Union and by coordinating and strengthening practical cooperation and information exchange. [...]

3. The Agency shall be a centre of expertise by virtue of its independence, the scientific and technical quality of the assistance it provides and the information it collects and disseminates, the transparency of its operating procedures and methods, its diligence in performing the tasks assigned to it, and the information technology support needed to fulfil its mandate”.

Moreover, by virtue of points (a), (c) and (j) of Article 2(1) of the EUAA Regulation, “[...] the Agency shall perform the following tasks:

(a) facilitate, coordinate and strengthen practical cooperation and information exchange among Member States on their asylum and reception systems;

[...]

(c) support Member States when carrying out their tasks and obligations in the framework of the CEAS;

[...]

(j) provide adequate support to Member States in carrying out their tasks and obligations under Regulation (EU) No 604/2013”.

The processing of your personal data, which you have shared on a voluntary basis, is necessary for the preliminary steps carried out in case of publication of information provision products in the LSA Information Provision Library and/or to ensure that the LSA portal functions properly and effectively meets user requirements.

Consequently, the processing of your personal data is lawful under Article 5(1) point (a) of the EUDPR given that it is necessary for the performance of the tasks that the Agency has been vested with by virtue of its mandate.

To the extent that the submission of information provision products and/or your feedback/suggestions is entirely voluntary, your personal data are processed on the basis of your consent and therefore this processing operation is also lawful under Article 5(1) point (d) of the EUDPR.

4. Which personal data do we collect and further process?

The following (categories of) personal data may be collected and further processed using the [‘Submit info provision document’](#) or [‘Contact us’](#) forms:

- Name and surname;
- Organisation/institution;
- E-mail address;
- Owner of the information provision product being submitted, if the owner is a natural person;
- Any personal data that you might include, upon your own initiative, in the form of free text.



5. How long do we keep your personal data?

Personal data collected through the '[Submit info provision document](#)' form will be kept for as long as follow-up actions are needed. In case the information provision product shared by the concerned user is published in the LSA Info Provision Library, the said user's personal data will be retained for as long as the information provision document submitted is accessible via the LSA portal.

Personal data collected through the 'Contact us' form will be retained for as long as necessary to take follow-up actions to address the concerned user's comment/query.

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

All personal data in electronic format are stored on the servers of the EUAA. In order to protect your personal data, we have put in place a number of technical and organisational measures as required under Article 33 of the EUDPR. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed.

For website security purposes, network traffic is monitored to identify unauthorised attempts to exploit or change information on this website or otherwise cause damage or conduct criminal activity. Anyone using this Portal is advised that, if such monitoring reveals evidence of possible abuse or criminal activity, results of such activity might be provided to the appropriate authorities in line with the applicable rules.

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons posed by the processing, the following security measures are applied:

- The pseudonymisation and encryption of the data;
- The ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- The ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- A process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing;
- Personal data will solely be processed by authorised personnel who are:
 - granted access to the personal data on a need-to-know basis;
 - familiar with the obligations stemming from the applicable data protection rules;
 - regularly trained in the care, protection and handling of personal data;
 - authorised to process the personal data; and
 - subject to a duty of confidentiality (either as a statutory or contractual obligation);



- Additional particular security controls: The EUAA ICT has implemented and maintains the following security controls for user data, consistent with global cloud service provider industry best practices, including:
 - Controls, Policies & Procedures: Appropriate technical and administrative controls, and organisational policies and procedures;
 - Named person in the role as a dedicated Information Security Officer (ISO) with focus on security in all areas of the EUAA business;
 - Logging: System and application logging where technically possible, whereas EUAA ICT retains logs for a maximum six (6) months and verifies such logs periodically for completeness;
 - Malicious code and/or software: Malware prevention software (e.g. antivirus) is implemented on the technical infrastructure where applicable;
 - Traffic inspection: Vulnerability exploit inspection is implemented on the technical infrastructure where applicable.
- System Security: System and IT security controls at EUAA ICT follows industry best practices, including:
 - A high-level infrastructure diagram, which can be provided upon request;
 - A mix of industry standard cloud and software firewalls to dynamically limit external and internal traffic between our services;
 - Ad-hoc penetration testing by an independent third party, with a detailed written report issued by such third party and provided upon request;
 - Documentation of identified vulnerabilities ranked based on risk severity and corrective action according to such rank;
 - Password policy controls are implemented to protect data including complexity requirements and multi factor authentication where available.

7. Who has access to your personal data and to whom are they disclosed?

The following (categories of) recipients may have access to your personal data:

- EUAA personnel responsible for verifying the content and publishing information provision products in the Library;
- EUAA personnel responsible for managing the LSA portal;
- The general public may have access to personal data that must be published concerning information provision products submitted (e.g., personal data related to ownership over said products where the owner is a natural person), in order for the Agency to respect copyright.

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

This processing activity does not entail any transfers of personal data to third countries or international organisations (outside the EU/EEA).

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



This processing activity does not involve automated decision-making, including profiling.

10. What are your rights and how can you exercise them?

According to the EUDPR, you are entitled to access your personal data and to rectify them in case the data are inaccurate or incomplete. If your personal data are no longer needed by the EUAA or if the processing operation is unlawful, you have the right to erase your data. Under certain circumstances, such as if you contest the accuracy of the processed data or if you are not sure if your data are lawfully processed, you may ask the Data Controller to restrict the data processing. You may also object, on compelling legitimate grounds, to the processing of data relating to you. Additionally, you have the right to data portability which allows you to obtain the data that the Data Controller holds on you and to transfer it from one Data Controller to another. Where relevant and technically feasible, the EUAA will do this work for you.

If the processing of your personal data is based on your consent, you are, *inter alia*, entitled to withdraw such consent at any time. However, the withdrawal of your consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise your rights, please contact the Data Controller, i.e., the Head of Asylum and Reception Cooperation and Guidance Unit, by sending an e-mail to lsa@euaa.europa.eu.

You may always submit queries, remarks or complaints relating to the processing of your personal data to the Data Protection Officer (DPO) of the EUAA by using the following e-mail address: dpo@euaa.europa.eu.

In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) using the following e-mail address: edps@edps.europa.eu.