Moderation and Privacy Policy

Moderation policy

1. Who operates this site?

⌄ More info

This site is operated by a consortium of three organisations – ESN, ECAS and CARSA – on behalf of and under contract to the European Commission.

2. Moderation:

⌄ More info

Our moderators work to maximise the value of the site to all of its users.

They assess content submitted for publication by registered users and either publish it or reject it (with an explanation).

They may intervene to merge, split, move or close discussion threads, or to direct participants' attention to other relevant content. They will also intervene to prevent unacceptable use of the site.

3. Acceptable use of the site:

⌄ More info

We welcome and encourage open and frank discussion relevant to the European Citizens' Initiative and/or to specific initiatives.

The site should not be used to promote specific political, commercial or religious viewpoints, or for discussion of other irrelevant or unrelated topics.

Users should avoid all abusive or potentially offensive language.

Moderators reserve the right to remove posts that breach these guidelines and/or to cancel the registration of any user who grossly or persistently fails to observe them.

Privacy Statement

1. Introduction

⌄ More info

The Online Collaborative Platform ('Platform') for the European Citizens' Initiative (the "European Citizens' Initiative Forum") offers support on preparing European citizens' initiatives and stimulate debate around them and also around the instrument as such and its implementation[1].

The Platform is addressed to the current and potential initiative organisers, experts, civil society stakeholders, the Commission and other institutions and more generally all citizens interested in the European Citizens' Initiative.

It is meant to help (potential) organisers interested in starting an initiative to find partners in Europe to form the required citizens' committee, formulate the content of their initiative together with more experienced participants, prepare campaigns, learn how to raise funds and run a campaign and exchange experiences and best practices with other organisers.

The Platform also allows all interested citizens to participate in, and to follow the discussions concerning both the initiatives at their different stages and those relating to the horizontal aspects of the functioning of the European Citizens' Initiative instrument.

The Commission makes available the IT infrastructure of the Platform while the operation of the Platform (including personal data processing) is entrusted to an external partner ('Platform Operator'). The Platform Operator is responsible for the management of the operational features of the Platform and assumes the function of data processor.

The Platform provides a NEWS & DISCUSSION FORUM; i.e. online discussion and blog articles on topics related to the European Citizens' Initiative with a view to fostering interaction between members of the European Citizens' Initiative community, information and best practice exchange, partner identification, etc.

The Platform also provides a HELPDESK, which consists of two components, a learning space offering guidance materials and an online course on relevant aspects on an initiative lifecycle and an enquiries and direct support mechanism.

The NEWS & DISCUSSION FORUM is complemented by the newsletter functionality.

The Platform uses a third-party service for newsletter delivery and administration (Mailjet[2]).

In 2018 and 2019, the Platform is implemented based on a Pilot Project from the European Parliament. However, the Platform may be maintained as a permanent tool beyond 2019 in the same or in a modified form.

2. Why do we process your data?

⌄ More info

If you are a **Registered User (including Platform Administrator)** the data which you provide are processed in order to allow your connection and further interaction with the Platform and its Users, in view to facilitate community building, collaboration and exchange among the Users.

In particular, your name will appear next to different inputs which you may provide on the Platform and the other Registered Users will be able to consult the information in your Profile (with the exception of your email address).

You may also appear in results of the search performed by the other Users based on "country of residence" and "area of interest" criteria.

Whether you are a Registered User or a visitor, you may **subscribe to receive the Platform newsletter** by providing your e-mail address specifically for this purpose.

The Platform is implemented based on Article 4(1) of Regulation 211/2011 on the European citizens' initiative, which stipulates in its paragraph 5 that the Commission shall provide information and assistance on the ECI.

While the processing of your personal data is based on your voluntary registration and subscription, it is lawful based on Article 5(d) of Regulation (EC) 45/2001.

3. Which personal information do we collect, and process?

(i) Registered User (including Platform Administrators)

⌄ More info

In order to connect with the Platform as its Registered User (including Platform Administrators) you need first to register via the European Commission 'EU Login' Authentification Service.

Your data provided on this occasion is subject to the privacy statement of the European Commission Identity & Access Management Service (IAMS)[3].

When you are registered and identified via 'EU Login' Authentification Service, upon your first connection with the Platform, a User Profile will be created for you in the Platform Data Base, where your first name, family name and email address will be automatically imported.

You will be further invited to provide the following personal data/information in order to complete your User Profile:

- nationality
- country of residence
- age group
- gender
- interest area
- profession/role
- background and motivation to use the Platform
- photo

The minimum information which you will need to provide in your Profile so that it is deemed complete and can be saved is "country of residence" and "area of interest".

(ii) Newsletter subscribers

⌄ More info

If you want to receive the Platform newsletter (whether you are or not the Platform Registered User) you will need to subscribe via a dedicated Platform functionality by providing your email address. Your email address submitted in this context will then be transferred manually and stored in a data base of the Mailjet application used for generating and delivery of newsletters. It will be processed according to European Data protection and privacy legislation[4] and to a specific Mailjet privacy statement[5].

4. Who has access to your information and to whom is it disclosed?

⌄ More info

Your first name and family name will be displayed next to any content you publish on the Platform and thus will be visible to the general public;

The data and information contained in your User Profile (with the exception of email address) will be visible to all the Registered Users,

The full content of your User Profile including your email address will be visible to the Platform Administrators.

Your email address being part of your User Profile will be only communicated to the other individual Registered Users, if you explicitly agree to communicate these data via a dedicated functionality of the Platform:

- In case another Registered User wants to contact you individually he can fill in a contact form provided on the Platform by providing your name and the content of the message to be sent. You will then receive the message from this User at the email address used by your EU Login account. The email address of the User who contacted you will appear as the sender of the message. You may then respond to the sender and thus provide him with your email address.
- Conversely, in case you want to contact individually another Platform User you will need to use the same Platform functionality and provide thereby the User concerned with your e-mail address.

5. How do we protect and safeguard your information?

⌄ More info

The Platform Database is hosted by an external secured cloud provider and administrated by the European Commission (DG DIGIT).

Patches and updates are regularly installed by the IT team to keep the servers protected against intrusion and malicious access.

The Platform Operator is bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of Directive 95/46/CE replaced as of 25 May 2018 by the General Data Protection Regulation.
Email addresses processed in the context of the newsletter subscription are stored in the Mailjet application database. The host servers on which Mailjet processes and stores its databases are located exclusively within the European Union.

6. How can you verify, modify or delete your information?

⌄ More info

According to Regulation (EC) n°45/2001, you are entitled to access your personal data and rectify and/or block it in case the data is inaccurate or incomplete. You can exercise your rights by contacting the data processor, or in case of conflict the Data Protection Officer and if necessary the European Data Protection Supervisor using the contact information given at point 8 below.

(i) Information you have provided as part of your Registered User Profile

⌄ More info

You can check, modify, update and delete the information in your User Profile online by yourself directly (with the exception of the information imported from the EU Login Authentication Service). You can also request the deletion of your User Profile from the Platform database by email to be addressed to the Platform Administrator at: contact@ECI-platform.eu .

(ii) Information you have provided as part of your registration at the EU Login Authentication Service

⌄ More info

Rules on access, verification, modification and deletion of your data contained in your EU Login account are defined in the specific privacy statements of the European Commission's Identity Management Service.

(iii) Email address you have provided as part of the newsletter subscription

⌄ More info

You can unsubscribe from the Platform newsletter at any time by following the link provided at the bottom of each newsletter you receive. You can also request the deletion of your email address provided in this context by email to be addressed to the Platform Administrator at: contact @ECI-platform.eu.

7. How long do we keep your data?

(i) Information you have provided as part of your registration at the EU Login Authentication Service

⌄ More info

Time limits of the retention of data in the EU Login Authentication Service are defined in the privacy statement of the European Commission's Identity Management Service.

(ii) Information you have provided as part of your User Profile (as Registered User including Platform

Administrator)

⌄ More info

Personal data contained in your User Profile will be kept on the site as long as you remain active, you have not deleted data in your Profile by yourself and you have not requested the Platform Administrator to remove your User Profile from the Platform.

After two years of continuous inactivity, your User Profile will be deleted.

To ensure the consistency of the Platform and the coherence of its content, your contributions and comments will be kept on the Platform in case of an eventual deletion of your User Profile in an anonymised version.

(iii) Email address you have provided as part of the newsletter subscription

⌄ More info

The subscribers email addresses are stored for the time needed to provide the newsletter service, and in any event no longer than 3 months after receiving a request to unsubscribe (unless otherwise required by law).

An 'unsubscribe' link is included in every newsletter.

8. Contact Information

⌄ More info

You have the following means to address questions or complaints to the European Commission concerning privacy policy:

The controller unit in the European Commission is Unit SG.A1 which ensures that the processing of personal data is performed within the Data Protection constraints established by Regulation (EC) No 45/2001. You can contact the controller at SG-DSG1-UNITE-A1@ec.europa.eu

You have the right to lodge a complaint regarding the processing of your data at any time with:

- The Data Protection Officer (DPO) of the Commission: DATA-PROTECTION-OFFICER@ec.europa.eu
- The European Data Protection Supervisor (EDPS): edps@edps.europa.eu.

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[1] For more information on the European Citizens' Initiative, see ec.europa.eu/citizens-initiative

[2] https://www.mailjet.com/

[3] Platform Administrators are members of the European Commission Staff in charge of either the European Citizens' Initiative in general or specifically of the IT tool on which the Platform is based, or members of the dedicated Staff of the Platform Operator.

Please consult this specific privacy statement for the relevant information corresponding to points 4-8 of the present privacy statement.

[4] https://www.mailjet.com/gdpr/mailjet-gdpr-compliance/

[5] https://www.mailjet.com/privacy-policy/

Please consult this specific privacy statement for the relevant information corresponding to points 4-8 of the present privacy statement.

[6] Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

[7] https://intragate.ec.europa.eu/cas/privacyStatement.html

[8] https://intragate.ec.europa.eu/cas/privacyStatement.html