



EUROPEAN COMMISSION

**PRIVACY STATEMENT FOR TARGETED CONSULTATION ACTIVITIES ORGANISED BY THE EUROPEAN COMMISSION AS PART OF THE STUDY ON THE MISUSE OF VERY LARGE ONLINE PLATFORMS AND VERY LARGE ONLINE SEARCH ENGINES TO COMMIT TRAFFICKING IN HUMAN BEINGS IN THE EU**

**PROTECTION OF YOUR PERSONAL DATA**

**Processing operation:** *Targeted consultation activities (surveys and interviews) for the study on the misuse of Very Large Online Platforms and Very Large Online Search Engines to commit trafficking in human beings in the EU*

**Controller:** *European Commission, Directorate-General for Migration and Home Affairs, Unit C4 and Directorate-General for Communications Networks, Content and Technology Unit F3*

**Record reference:** *DPR-EC-01011*

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**Introduction**

The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used )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, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to the processing of personal data linked to targeted consultation activities organised by the services of the Commission.

## **1 Why and how do we process your personal data?**

Purpose of the processing operation: The Commission collects and uses your personal information within the framework of targeted consultation activities to obtain your views on a specific initiative, policy or intervention.

The targeted consultation activities of this study will feed into the research study on the misuse of Very Large Online Platforms and Very Large Online Search Engines to combat trafficking in human beings in the EU.

The study aims to provide the European Commission with a targeted and evidence-based understanding of how VLOPs (Very Large Online Platforms) and VLOSEs (Very Large Search Engines) are misused for trafficking in human beings and to increase awareness of the systemic risks that these services face across the EU, with a particular focus on trafficking in human beings for the purposes of sexual and labour exploitation, forced criminality, exploitation of surrogacy or trafficking for organ removal.

This assignment has been entrusted to the consortium led by Ecorys Europe EEIG – GEIE.

You are being contacted by the service of the Commission/and or by Ecorys Europe since it has concluded that your views are relevant and necessary to inform the specific initiative, policy or intervention concerned by the targeted consultation.

The contact details of the prospective respondent are already in the possession of/processed by the controller. The stakeholder consultations will include:

- o Holding interviews;
- o Conducting surveys.

### *Interviews*

Interviews will typically be conducted in person, by phone, online platform (Microsoft Teams), and/or email (in case of written contribution as alternative to the interview), and may require follow-up questions and clarifications.

The study is commissioned for research purposes by the European Commission and will not be made public. Direct attribution of quotes or personal identifiers will only be made with explicit consent.

### *Audio recording of the interviews*

For accuracy and note-taking purposes, and only with the interviewee's consent, interviews will be audio-recorded. The recordings will be kept by the research team only for the purpose of drafting the Consultation Report. They will be deleted afterwards, latest within six months, and will not be shared outside the research team.

## *Surveys*

The objective of the surveys is to gather insights from stakeholders, particularly robust and reliable quantitative data. The survey questionnaires will include both closed-ended and open-ended questions to collect comprehensive information, as well as provide stakeholders with the opportunity to express their views and insights. Surveys will be distributed via a specific platform (EUSurvey<sup>1</sup>).

It is your responsibility (i.e. of each stakeholder contributing to consultation) if you opt for confidentiality of your personal data to avoid any reference in your submission or contribution itself that would reveal your identity.

The consultation activity may use the Commission's online questionnaire tool EUSurvey that requires you to login via your 'EU Login' or 'social media account'. 'EU Login' requires certain personal data such as the name, surname and e-mail address of the registrant. For further information, please refer to the privacy statements of 'EU Login' and 'EU Survey' as well as the processing operations 'Identity & Access Management Service (IAMS)' (reference number in the public DPO register: [DPR-EC-03187](#)) and 'EUSurvey' (reference number: [DPR-EC-01488](#)). Should you choose to log in through your social media account, please refer to the pertinent social media platform's privacy statement.

When using web-scraping and annotation infrastructure to support the quantitative and qualitative components of the study, collection is strictly limited to publicly accessible online content on platforms and follows applicable EU data protection and ethical standards. Ethical and safeguarding considerations are embedded throughout the process. The system operates under strict data minimisation principles, secure storage protocols, and controlled access procedures. No victim profiling or identification is conducted. Sensitive content is handled using trauma-informed review procedures, and automated classifications are subject to human oversight to mitigate bias and misinterpretation. The toolchain is designed to systematically detect, classify, and analyse publicly accessible online content relevant to trafficking in human beings (THB) across Very Large Online Platforms (VLOPs), Very Large Online Search Engines (VLOSEs), and selected complementary platforms.

Your contribution to the targeted consultations may be stored in the Commission's document management system (for further information on the Commission's document management system please refer to the processing operation 'Management and (short- and medium-term) preservation of Commission documents', reference number: [DPR-EC-00536](#)).

The personal data processed may be reused for the purpose of procedures before the EU Courts, national courts, the European Ombudsman or the European Court of Auditor.

Your personal data will not be used for an automated decision-making including profiling. The study will not be made public. The stakeholder input itself may be summarised, and used only in an anonymised form if so requested

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<sup>1</sup> EUSurvey, available at: <https://ec.europa.eu/eusurvey/home/welcome>

## 2. On what legal ground(s) do we process your personal data

We process your personal data, because:

- (a) processing is necessary for the performance of a task carried out in the public interest;
- (b) it is, based on your consent, for one or more specified purposes and limited to the relevant categories of personal data concerned in compliance with Article 5(1) (d) of Regulation 2018/1725:
  - If the subject matter of a targeted consultation requires respondents to provide personal data in their response that make the data subject directly or indirectly identifiable, including professional opinions attributable to a named individual;
  - the processing of special categories of personal data whether they are necessary for the targeted consultation or provided spontaneously by the respondent;
  - to be contacted by the Commission for the present consultation (*in case the respondent had previously consented to be contacted by the Commission for such type of consultation*).
  - Audio recordings of the interviews.

The Union law which is the basis for the processing based on Article 5(1)(a) of Regulation (EU) 2018/1725 is the Treaty of the European Union, and more specifically its Articles 1 and 11, Article 298 of the Treaty on the Functioning of the European Union, read in conjunction with Recital 22 of Regulation (EU) 2018/1725), as well as the Protocol 2 on the application of the principles of subsidiarity and proportionality. In addition, where the consultation relates to the Commission's data access and scrutiny under Regulation (EU) 2022/2065 on a Single Market for Digital Services (Digital Services Act), the legal basis further includes, Articles 40 and 41 DSA.

The interview guide, questionnaire and consent form will be shared in advance, which will clearly state that participation in the interview is voluntary and include a question asking participants to confirm whether they agree or not to take part in the interview. Interviewees are invited to complete the consent form and provide the completed document to the research team prior to, or at the start of, the interview.

## 3. Which personal data do we collect and further process?

In order to carry out this processing operation the following categories of personal data may be processed:

For the stakeholder interviews:

- *name and surname,*
- *profession,*
- *country of residence,*
- *e-mail address of the respondent,*
- *the name of a self-employed individual (natural persons) on whose behalf the respondent is contributing,*
- *personal data included in the response or contribution to the targeted consultation activity, including (personal) opinions (if the targeted consultation at hand requires so),*
- *Audio recordings.*

For the survey:

- *profession,*
- *country of residence,*
- *e-mail address of the respondent,*

- *personal data included in the response or contribution to the targeted consultation activity, including (personal) opinions (if the targeted consultation at hand requires so).*

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply to the targeted consultation.

Please note that the Data Controller does not request nor expect that data subjects provide any special categories of data under Article 10(1) of Regulation 2018/1725 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data the data subject is considered to provide his/her explicit consent to the processing, in accordance with Article 10(2)(a) of Regulation 2018/1725.

If you provide contact information for other potential interviewees, that information will be managed with the same level of care and confidentiality as your own personal data. Please ensure that you inform and get their permission before you share their contact information. The potential interviewees will only participate in this exercise if they explicitly consent to do so. If these potential interviewees decline to participate in the consultation, their personal data will be deleted immediately.

#### **4. How long do we keep your personal data?**

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely for a maximum of five years after the closure of the file to which the present targeted consultation belongs. A file is closed at the latest once there has been a final outcome in relation to the initiative to which the targeted consultation contributed.

This administrative retention period of five years is based on the retention policy of European Commission documents and files (and the personal data contained in them), governed by the common Commission-level retention list for European Commission files [SEC\(2019\)900](#). It is a regulatory document in the form of a retention schedule that establishes the retention periods for different types of European Commission files. That list has been notified to the European Data Protection Supervisor.

The administrative retention period is the period during which the Commission departments are required to keep a file depending on its usefulness for administrative purposes and the relevant statutory and legal obligations. This period begins to run from the time when the file is closed.

In accordance with the common Commission-level retention list, after the ‘administrative retention period’, files including (the outcome of) targeted consultations (and the personal data contained in them) can be transferred to the Historical Archives of the European Commission for historical purposes (for the processing operations concerning the Historical Archives, please see record of processing ‘Management and long-term preservation of the European Commission’s Archives’, registered under reference number [DPR-EC-00837](#)).

The retention period for the audio recording that may be made in the course of the stakeholder interviews, will be retained for a maximum of six months.

#### **5. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the Commission (or of its contractors (processors) if contractors are engaged to assist the controller). All processing operations are carried out pursuant to [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. 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. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The Commission's processors (contractors) are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

## **6. Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle, in particular to follow-up on the targeted consultation. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to your personal data is provided to the Commission's contractor the consortium led by Ecorys Europe EEIG GEIE responsible for carrying out the evaluation and to authorised staff according to the "need to know" principle.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

## **1. What are your rights and how can you exercise them?**

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Under certain conditions, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing and the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

Insofar you have consented to the certain processing of your personal data to the Data Controller for the present processing operation, you can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict, the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 8 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 9 below) in your request.

In accordance with Article 14(3) of Regulation (EU) 2018/1725, your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such a case, you will be informed of the extension of the time limit, together with the reasons for the delay.

## **2. Contact information**

### **- The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller.

- European Commission, Directorate-General for Migration and Home Affairs and Directorate-General for Communications Networks, Content and Technology at [HOME ANTITRAFFICKING@ec.europa.eu](mailto:HOME_ANTITRAFFICKING@ec.europa.eu) or at [CNECT-F3@ec.europa.eu](mailto:CNECT-F3@ec.europa.eu).

### **- The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **9. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-01011.