

Anlage 1:

**Annex 1 des Dokuments „EDPB DPO-Network –
assessment of Twitter usage by SAs and the EDPB“**

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Annex I

Replies on the use of Twitter

Entity	Use of Twitter (Y/N)	Details
EDPB	Y	Twitter used for communication / sharing information purposes.
PL	Y	<p>General principles: The Communications Department is responsible for Twitter. The Personal Data Protection Office (PDPO) has 2 profiles - in Polish @UODOgov_pl and in English @PDPO_Poland. Access to Twitter account in Polish is provided by the Communications Department, additionally in English by the Director of the International Cooperation and Education Department.</p> <p>Terms and conditions: The Personal Data Protection Office does not have internal rules on the use of Twitter, unwritten rules of use apply. Establishing the rules is in progress. There are plans to create a list of activities and rules on the use of Twitter, among others to determine the rights of the PDPO to block and remove defamatory and offensive content. Currently, there is a small number of offensive entries on PDPO profiles, so there has been no urgent need for developing the rules on Twitter usage.</p> <p>Communication activities: Twitter serves as an additional channel of communication for the Office - a way of information and promotion that does not require additional financial resources. The published content is mainly of informative and content-related nature, and less frequently in the form of an image. The instructional videos developed by the PDPO are made available. The messages presented very rarely encourage the exchange of views or the submission of ideas. Twitter informs about the ongoing consultations on the EDPB guidelines. It promotes events organized by the PDPO and encourages participation in them.</p>

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		<p>Almost 100% of Twitter content refers to www.uodo.gov.pl for more information, and increases traffic on the PDPO website.</p> <p>Information media: Twitter gives the opportunity to communicate directly with the citizens. It supports the building of trust in the PDPO and the efficiency of its operations. It enables the effectiveness and speed of information transmission. Twitter is often used as a tool to generate traffic at www.uodo.gov.pl, the main source of information. It allows to monitor the network. Observation of user discussions allows to actively and continuously react in terms of solving problems and adapting content to users' needs. It provides tools to examine the evaluation of the PDPO initiatives and policies.</p>
CZ	Y	<p>CZ SA uses Twitter and has only one profile – in Czech language. Press Department, or more precisely CZ SA's spokesman is in charge of managing the Twitter account, some reports are approved by director of cabinet of SA's president. CZ SA doesn't have written internal rules on the use of Twitter, unwritten rules are applied. For the time being there isn't any offensive content or post from "followers" therefor no reason to block. The use of Twitter doesn't require additional financial or personal resources. CZ SA doesn't have a dedicated DPO record for Twitter usage. Twitter is used mostly as a way of information or promotion about news on website https://www.uoou.cz/. Actual observations of SA and its leaders, important media appearances or important events and anniversaries (for example Data Protection Day) are also published.</p>
AT	N	N/A
LI	N	N/A
HU	N	N/A
FR	Y	As you know, the question asked by the Plenary session is very important as it could deeply impact our ability to communicate with our audiences (SA's specific task under article 57).

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		<p>The CNIL uses today :</p> <ul style="list-style-type: none"> - widgets on its website (to permit users to share contents), but they are deactivated by default ; their activation needs users to consent to a cookie storage ; - static links to social media without any cookie storage (in our newsletter for instance) ; - social media accounts (Twitter, Facebook, LinkedIn, YouTube). <p>As you noted, the EDPB recalled on July 2018 that “The ECJ considers that a fan page owner should be regarded as a joint controller because he/she has the possibility to define parameters, which have an influence on the processing of personal data for the purpose of producing statistics based on the visits to the fan page. A fan page owner can, for example, request that statistics are drawn up according to specific criteria (age, gender, occupation ...).” The CNIL only uses a part of basic statistics produced by the platforms by default and assumes its own responsibility on the processing it really defines (see our GDPR records https://www.cnil.fr/sites/default/files/atoms/files/registre-rgpd-cnil_dec-2020.pdf - activities 4.1 and 4.5).</p> <p>It seems essential to find a balanced approach to this topic to be able to continue to use social media in a secure way given the stakes on our communications policies. It is interesting to notice that the KEYP subgroup is indirectly working on this issue (controller/ processor guidelines).</p>
DE Federal	Y, but not active	See paper
LU	N	No, the Luxembourg SA has recently deactivated its Twitter account (which had not been used since 2011).
EL	N (but with intent to)	The EL SA is developing a new website, where the functionality of sharing content through Twitter (via a widget) is promoted. The proposed solution, so far, is to deploy such a widget as a link to said functionality, i.e. activated upon being clicked on (using ‘href’ property and an alt-img image). In addition, the user would have to provide its consent to the relevant processing, before this happens, being prompted to do so in a dedicated pop-up that leads it to the respective information and consent collection page.

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NL	Y	<ul style="list-style-type: none"> NL uses Twitter to disseminate information from the SA to the public and NL uses Twitter to communicate with the public. The use of social media is recorded in the record of processing activities, however, there is no specific privacy statement for social media. NL does not use any widgets.
LT	N	N/A
BE	Y	<p>Purposes and processing activities We use Twitter for two purposes:</p> <ul style="list-style-type: none"> - Information sharing (outgoing flux): push notifications (e.g. publishing our press releases, sharing new of other (Belgian) SAs, sometimes answering on tweets/comments of others, ...); - In rare cases we use information, notifications or reactions to start a new process in our SA, called ‘monitoring’ (incoming flux). This way Twitter is used as ‘open source’ or as means to know what’s happening in the ‘field’. This can be the start of an action of awareness, investigation, etc. <p>We also use Twitter for statistics so we know how many people read our tweet (only number, no names). You can also see who liked our tweet and if they retweeted your tweet (only with open account of the user).</p> <p>Practical implementation We use static links. We gave information to the public about this in our cookie policy so that the public is aware when they click on the link, Twitter can collect information and it is their responsibility (of the user/public) (more information: https://www.dataprotectionauthority.be/cookie).</p>

Anlage 2:

**Annex 2 des Dokuments „EDPB DPO-Network – assessment of Twitter usage by SAs and the EDPB“ (mit Schwärzung einer Referenz);
es wird darauf hingewiesen, dass die darin enthaltenen Informationen möglicherweise nicht mehr aktuell sind**

Annex II

Twitter cookies: technical explanation and overview

Cookies are pieces of information that are stored on the user's computer and transmitted or can be read out by the website that stores them when the user revisits it. Cookies provide a way for the website to recognize you and keep track of your preferences.

Some companies use cookies purely to remember you when you return to their website, so that you don't have to sign in again. Those are known as “first-party cookies”, and they are a great way to make the web more convenient. Other publishers let Adtech companies put their own cookies on your site, which are then used to track you across different publishers. That is why, for instance, a life insurance company suddenly knows that you have been searching for ways to give up smoking.

The main purpose of a cookie is to identify users and possibly prepare customized web pages for them. When you enter a website using cookies, you may be asked to fill out a form providing such information as your name and interests. This information is packaged into a cookie and sent to your browser, which stores it for later use. The next time you return to the same website, your browser will send the cookie to the server. The server can use this information to present you with customised pages. For example, instead of seeing a generic welcome page, you might see a page that welcomes you by name, or shows when you last visited the site.

Accepting a cookie does not give a server access to your computer or to any of your personal information (except for any information that you may have purposely given, as with online shopping). It is also not possible to execute code from a cookie, or to use it to deliver a virus. However, although webmasters have always been able to track access to their sites, cookies make it easier to do the things mentioned above. In some cases, cookies come, not from the site the user is visiting, but from advertising companies that manage the banner ads for a set of sites, or from plugin (widget) operators that the site uses in order to deliver its content, or perform as stated above. These advertising or social media companies can develop detailed profiles of the people who select ads or use their plugins/widgets (functionalities) across their customers' sites.

A cookie will typically contain a string of text with information about the browser. Some websites do use cookies to store more personal information about the user, however, this can be done only if the user provides that personal information. Legitimate websites will encrypt personal information stored in the cookie to prevent unauthorized usage by another party with access to the user's cookie folder.

Cookies have parameters that can be passed to them:

- The name of the cookie.
- The value of the cookie.
- The expiration date of the cookie: this determines how long the cookie will remain active in your browser.
- The path the cookie is valid for. Web pages outside of that path cannot use the cookie.
- The domain the cookie is valid for. This makes the cookie accessible to pages on any of the servers in a domain.

- The need for a secure connection: this indicates that the cookie can only be used under a secure server condition.

Cookies are inherently harmless, security wise, per se. They are simple, non-compiled text files that help coordinate the remote website servers and the user's browser to display the full range of features offered by most contemporary websites. These features include hassle-free automatic logins and authentication, shopping cart functionalities, third party ad serving, ad management, preference setting, language setting, among many others. However, since information contained in them could be used to identify/track the user, their duration, type and provider are crucial properties that can be set to eliminate such a risk factor, that outsiders may try to exploit.

Cookies that Twitter places on a user's device when embedding the Share/Tweet functionality on a webpage (based on own testing)

Name	Purpose	Provider	Type	Duration
personalization_id	Used by Twitter if you are logged in to Twitter to associate your device with your Twitter account; Twitter may also use this cookie for personalization across devices whether or not you are logged in to Twitter; carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the said website	.twitter	Secure	2 years
guest_id	(version and id) set by Twitter to identify and track the website visitor; If you do not have a Twitter account or never accessed the Twitter.com website directly then Twitter will assign you a unique code to track your visit to the Twitter feed	.twitter	Secure	2 years
_twitter_sess	CSRF token; lets website visitors use Twitter-related features from within the web page they are visiting Decoded Base64 value reveals RubyOnRails flash method for storing a hashed/encrypted value with [used, created at and csrf] attributes and one or more substring (possibly id) values { "flashIC:'ActionController::Flash::FlashÛ Hash{ @used{created_atl+ LÖ?q:csrf_iÛ d"%1d1e8ca5680c3d910852a58b7caae3	.twitter	Secure , HTTP	session

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external_referrer	The url the visitor was viewing when they got directed to the twitter website ; Used to aggregate button usage	.twitter		1w
ct0	set due to Twitter integration and sharing capabilities for the social media	.twitter	Secure	4h
dnt	User's preference regarding tracking (Do Not Track flag)	.twitter	Secure, Strictly necessary	5y
csrf_same_site	Security, to prevent cross site request forgery	.twitter	Secure, http, Targeting	1y
csrf_same_site_set	Security, to prevent cross site request forgery	.twitter	Secure, http	1y
kdt	is generally provided by Twitter to monitor referral links and login status; is usually present when there is a "Tweet This" button or other Twitter widget present on the site	.twitter	Secure, http	1,5y
remember_checked_on	to identify you to Twitter: if you do not have a Twitter account or never accessed the Twitter.com website directly then Twitter will assign you a unique code to track your visit to the Twitter feed. These cookies help to display tweets on the site, monitor referral links, used to identify those logged into Twitter and collect data related to the Twitter platform	.twitter	Secure, http	5y
twid	Determine if user logged in during browser session; allow tweets; record number of times a page is tweeted	.twitter	Secure, Same Site=None	5y
lang	used to remember your language preference	twitter		session

ads_prefs	Ads preferences	.twitter	Secure, Same Site=None	5y	Board
auth_token	authentication token; used for logging in; session id	.twitter	Secure, http	session	
rweb_optin	turn on the new twittr layout/sidebar	.twitter.com	Secure	1y	
_ga	associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service; is used to distinguish unique users by assigning a randomly generated number as a client identifier; is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports	.twitter		2y	
_gid	contains no identifying information and is used for diagnostic purposes by Impact Radius, a service used to track signup commissions for our affiliate program	.twitter			
gt	Unverified	.twitter	Secure	4h	

The first five cookies are placed when selecting the sharing functionality on the hosting SA site, while the rest of the cookies are placed after being prompted and eventually logging on to the platform. The last three cookies are Twitter third party cookies, associated to Google Analytics.