

Privacy Notice

European Year of Digital Citizenship Education 2025 campaign : Use of the label generator and publication of selected labels on the campaign website

The label generator is a digital tool that invites users to affix pictures with the [European Year of Digital Citizenship Education 2025](#) campaign ribbon.

Anyone or any organisation interested in promoting and supporting the European Year of Digital Citizenship Education 2025 campaign can upload a picture on the label generator in order to export a generated picture with the campaign ribbon (hereafter “the label”). The use of the label generator as well as of the label itself is further detailed in the applicable terms of use, available [here](#).

For the purpose of this document, “pictures” refers to the photos or other images uploaded by users on the label generator, and “labels” means the pictures affixed with the campaign ribbon created by the label generator.

1. Who is responsible for data processing?

The Council of Europe or “we” is the “data controller” with respect to the processing of personal data in relation to the label generator and the publication of selected labels on the European Year of Digital Citizenship Education 2025 website, which means it has the decision-making power concerning the data processing. Processing of personal data is governed by the [Council of Europe Regulations on the Protection of Personal Data](#) adopted by the Committee of Ministers on 15 June 2022.

2. What data do we process and for what purpose?

We process personal data that we receive from the user, insofar as they are necessary for us to allow the user to export a label as well as to create a wall of labels to be displayed on the European Year of Digital Citizenship Education 2025 website.

We process the types of personal data listed below for the following purposes:

a) Creation of labels using the label generator

To enable the user to export a label from the label generator, we process the face(s) of the person/people featured in the picture uploaded by the user. The user may either voluntarily submit a picture of herself or himself, or a picture of a third person(s), provided the user has obtained their prior consent. The user can upload a picture of a minor(s) only having obtained prior consent of their legal representative.

b) Display of labels on the European Year of Digital Citizenship Education 2025 webpage

To promote the campaign, we may select certain labels to create a wall of labels and to display them on European Year of Digital Citizenship Education 2025 website.

The user can either give or withhold consent to the use of the label on the wall by selecting “Yes” or “No” on the label generator website. If the user submits a picture of a third person(s), the selection should be made according to the third person(s)’ will, which is the responsibility of the user.

In accordance with the terms of use, we reserve our right to remove any label from the website without notice.

3. What is the legal basis for our processing of personal data?

We process your picture and label on the basis of consent.

4. Who has access to personal data?

The process of converting a picture into a label is fully automatised. An external service provider may access pictures only for the maintenance of the website. It will act as data processor, which means that it will process personal data on behalf of the Council of Europe. Its access is strictly limited to what is needed to provide the service. Through technical, organisational and legal measures, we ensure that the rules provided in the Council of Europe Regulations on the Protection of Personal Data are also adhered to by our external service providers.

Only those units or persons within the Council of Europe who need to see the pictures in order to select, display on or remove the labels from the wall have access to them.

Selected labels will be made publicly available on the wall of labels displayed on the European Year of Digital Citizenship Education 2025 website. The responsibility for all other publication of the labels rests solely with the label generator's users, and falls outside the remit of this privacy notice.

5. How do we store personal data?

Personal data, i.e. pictures, will be stored electronically on the Council of Europe's servers located in the European Union. We have put in place measures to protect the security of personal information, including appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures include encrypted servers, limited access to any databases only for those people who need it and secure backup of all data.

6. How long will personal data be stored?

We only process pictures for the time needed to generate the label automatically.

If the user agreed to the label being published on the European Year of Digital Citizenship Education 2025 website, the label will be stored until 31 December 2025.

7. What are your data protection rights?

You have the right to:

- request access to your personal information held by us;
- request that we correct incomplete or inaccurate personal information that we hold about you;
- request that we delete or remove your personal information when there is no valid reason for us to keep it;
- object to the processing of your personal information on specific grounds relating to your situation;

- withdraw your consent at any time, in which case, the Council of Europe will cease to use your data. However, those copies of the data which have already been used cannot be withdrawn from circulation.

8. Contacts

If you wish to exercise the above rights, or for any queries, concerns, or requests you may have in connection with the way your data is collected and used, please contact the Council of Europe by:

- sending an email to digital.citizenship@coe.int.
- sending an email to the Council of Europe's Data Protection Officer at dpo@coe.int.

If you feel that we have not adequately responded to your request and consider that your data protection rights have been violated as a result of our processing of your personal data, you have the right to lodge a complaint with the Council of Europe Data Protection Commissioner by sending an e-mail to datacommissioner@coe.int.