

EUROVISION NEWS UKRAINE ARCHIVE PRIVACY NOTICE

The EBU takes the privacy of Your Personal Data seriously in accordance with EU General Data Protection Regulation 2016/679/EU ("**GDPR**"), the Swiss Federal Act on Data Protection ("**FADP**") and any other applicable data protection laws and regulations (together, the "**Data Protection Laws**"). Please read this Privacy Notice carefully to ensure You are fully informed as to who We are, why and how We collect, share, and use Your Personal Data, and how You can exercise Your privacy rights.

This Privacy Notice applies to You when You submit application form(s) to access the Catalogue and/or the Selected Material on the Ukraine Archive for viewing/listening purposes. AND/OR TO SEEK PERMISSION FOR USE OF THE MATERIAL

Capitalized terms under this Privacy Notice shall have the meaning ascribed to them under the [Ukraine Archive Terms and Conditions](#) ("**Terms & Conditions**"), unless expressly stated otherwise hereunder.



INTRODUCTION

This Privacy Notice describes how the **European Broadcasting Union/Union Européenne de radio-télévision** ("**EBU**", "**We**", "**Us**", "**Our**"), with registered office at L'Ancienne-Route 17A, 1218 Le Grand-Saconnex (Geneva) Switzerland and registered number CHE 107.741.078, process and use Personal Data pertaining to you, the Data Subject ("**You**", "**Your**"), when You submit Personal Data online via the application form(s) on the Ukraine Archive or by email for the purpose(s) mentioned further in this Privacy Notice.

The terms "**Controller**", "**Data Subject**", "**Personal Data**", "**process**", and "**processing**" shall have the meaning set out in the Data Protection Laws.



WHAT PERSONAL DATA DO WE PROCESS?

*When submitting Personal Data via the Ukraine Archive webpage, please make sure that Your browser shows a secure https connection, indicated by a **lock icon** in the browser's address bar.*

I. INFORMATION YOU PROVIDE WHEN YOU SUBMIT YOUR APPLICATION FORM(S) ON THE UKRAINE ARCHIVE TO ACCESS THE CATALOGUE, THE MATERIAL FOR VIEWING AND/OR LISTENING PURPOSES AND/OR TO SEEK PERMISSION FOR USE OF THE MATERIAL

Personal Data requested on the application form(s):

first name, last name, email address (personal and/or professional), work details (job title and name of the company You work for), name of manager/supervisor, email address of manager/supervisor, information on the project for which You are requesting access to the Ukraine Archive, and information on why You seek further permission to Use the Material.

We may use AI-supported tools to analyze the data submitted by You, notably to ensure the accuracy of the information provided in Your application form(s). This analysis may further include the creation of a summary of Your professional activities (e.g., projects You have worked for/on,

publications made, etc.). The purpose of this analysis is to assist Us in making efficient decisions regarding Your request to access the Catalogue and/or Selected Material. Please note that the automated processing has no legal or significant impact on You. The use of AI tools is supervised and conducted in compliance with data protection principles, ensuring transparency, accountability, and the security of Your Personal Data. The results of the AI analysis will be reviewed by the EBU, and the final decision will be made by a human, not solely by the AI system. The AI-assisted processing does not make binding decisions or produce legal effects. It is a supporting tool to improve the efficiency of decision making, but the ultimate decision rests with the EBU in accordance with the Terms & Conditions.

II. INFORMATION YOU PROVIDE BY EMAIL

We may request additional information from You by email that if We consider it necessary to make Our decision on whether You should be granted the right to access the Catalogue and/or the Selected Material. You may also provide Us by email, at any time on a voluntary basis, any additional information You consider useful to support Your request(s).

III. SPECIAL CATEGORY OF PERSONAL DATA

We will not collect or process any special category of Personal Data relating to You, except if You provide such Personal Data to Us on a voluntary basis because You deem it necessary for Us to know it for the purposes of Your request(s).



ON WHICH BASIS DO WE PROCESS PERSONAL DATA AND FOR WHAT PURPOSES?

We collect and process Personal Data relating to You based on the following basis:

- The performance of a contract;
- Legitimate interests; and
- Your specific consent.

The applicable basis for collecting and using Your Personal Data will depend on the Personal Data concerned and the purpose for which We process it. More detailed information is provided below with respect to the processing activities that may be undertaken.

ON THE BASIS OF THE PERFORMANCE OF A CONTRACT (TERMS AND CONDITIONS):

- [Managing and processing Your application form\(s\)](#) for accessing the Catalogue on the Ukraine Archive.
- [Managing and processing Your application form\(s\)](#) for accessing the Selected Materials on the Ukraine Archive for viewing/listening purposes.
- [Managing and processing Your application form\(s\)](#) to seek further permission to Use the Material.
- [Approving or declining Your request](#) for accessing the Catalogue and/or the Selected Material on the Ukraine Archive, in accordance with the Terms & Conditions, including [sending You emails to inform You of the approval or denial of Your request to access the Catalogue and/or view and/or listen to the Selected Material and, where applicable, the links to access such Selected Material](#).
- [Contacting You](#) regarding the Content Owner(s)' decisions on Your request to Use the Material.
- Subject to the Content Owner(s) approval, [give You access to the Selected Material for downloading and further Use](#).
- [Contacting You to provide and/or request additional information](#) to process Your request(s).
- [Managing](#) Our relationship with You the context stated above.

- [Allowing You to access and receive useful and important information](#) in relation to the Ukraine Archive (e.g., addition of new Material, removal of Material, etc.).
- [Sharing Your contact details](#) with the Content Owner(s) in case You submit a request for Use of the Material.
- Any [other form of processing that is necessary to manage and process Your request\(s\) properly](#).

ON THE BASIS OF LEGITIMATE INTEREST (UNLESS ALREADY COVERED BY A CONTRACTUAL OBLIGATION)

- [Performing aggregated statistical reporting](#) (e.g., number of application forms submitted, request approved/denied, number of Content Owners allowing further Use of the Material, etc.).
- [Request feedback](#) on the Ukraine Archive.
- [Fraud prevention and ensuring network and information security](#) of the Ukraine Archive.

ON THE BASIS OF CONSENT (UNLESS ALREADY COVERED BY CONTRACTUAL OBLIGATION OR LEGITIMATE INTEREST)

- If You provide Us [additional information on a voluntary basis about You](#) that You consider useful to support Your request(s).
- You opt-in for purposes of [sending newsletters/marketing emails](#).
- If You [join online groups \(such as dedicated WhatsApp groups created by the EBU or similar community online groups\)](#) for the purposes of providing You information on the Ukraine Archive.

Personal Data processed for a new purpose shall not be processed without first having a lawful basis for doing so.



WHO HAS ACCESS TO YOUR PERSONAL DATA?

Your Personal Data will be accessed and/or shared to the following individuals:

- **EBU Staff**
Your Personal Data will be collected and processed by the [individuals appointed as part of the "Ukraine Archive Team"](#), responsible for managing and processing Your application form(s) and request(s) to access the Catalogue, the Material for viewing/listening purposes, and/or in case You submit an additional request to further Use the Material.
- **The relevant Content Owner(s)**
We may share Your relevant Personal Data, with the [Content Owner\(s\)](#) in case You have seek permission to further Use the Material.
- **EBU's subcontractors and/or third parties**
We may share Your relevant Personal Data, on a need-to-know basis, with [companies providing mailing tools, providers of messaging apps](#), as well as [hosting, IT and Wi-Fi providers](#).

Third parties may also collect and process Personal Data for their own purposes. In such cases, they are independent Controllers for such processing, which is made under their own terms and conditions and privacy policies, as the case may be. We are neither liable for their processing nor the content of their terms and conditions and privacy policies.

Except as mentioned above, We will not make Your Personal Data available to any third-party and shall not publicly disclose the Personal Data unless such sharing is based on Your specific consent,

legitimate interest or otherwise authorised/compulsory by law or by order of an administration or judicial authority.

You may obtain information as to which third parties Your Personal Data has been shared with by sending Us an email at privacy@ebu.ch.

- **Transferring Personal Data to third countries**

Please note that whenever Your Personal Data is transferred to subcontractors and/or third parties located outside the European Economic Area (EEA), Switzerland or the United Kingdom, in countries which are not considered by the European Commission and by Swiss law to guarantee an adequate level of personal data protection ("Third Countries"), We will ensure that appropriate measures are implemented according to the Data Protection Laws. You may obtain further information as to which subcontractors and/or third parties located in Third Countries Your Personal Data have been made available and a copy of the appropriate safeguards We have implemented by sending Us an email at privacy@ebu.ch.

- **Direct marketing**

We will not use Your Personal Data for direct marketing purposes without Your explicit prior consent. If at any time You decide not to receive any commercial or promotional information from Us, You may, free of charge and without having to provide any justification, opt-out of any direct marketing campaigns and oppose to the future processing of Your Personal Data for such purposes by sending Us an email at privacy@ebu.ch and mentioning "opt-out" in the subject of Your email. Alternatively, You may use the opt-out procedure provided in any promotional message You receive from Us.

We may, however, still be required to contact You and shall send "information" emails where required for the purposes of providing important information about the Ukraine Archive, where there is a legitimate interest to send such "information" emails to You. Please note that opting out from receiving promotional messages from Us will not prevent You from receiving information that relates to any contract You may have entered into with Us.



FOR HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will retain Your Personal Data only as long as necessary for the fulfilment of the purposes described above or as required by law, and statutory limitation periods for claims.



HOW IS YOUR PERSONAL DATA PROTECTED ON THE ACCREDITATION PLATFORM?

We have implemented technical and organizational measures in accordance with standard industry practices to ensure an appropriate level of security of the Personal Data processed. Nevertheless, security requires efforts from all parties involved. We thus encourage You to contribute to these efforts by taking appropriate security measures yourself, including by using strong passwords and keeping all usernames and passwords (if any) confidential.



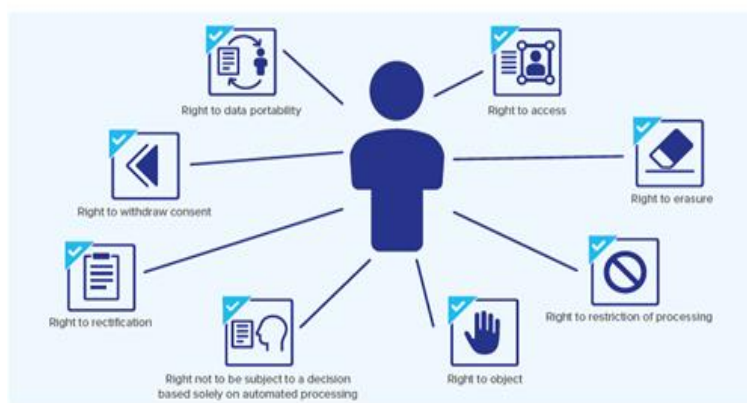
MINORS

The Ukraine Archive is not intended for or directed to minors under 16 years of age. We do not knowingly collect any information from such individuals. If you believe Your child has provided us with Personal Data, please contact us at privacy@ebu.ch.



YOUR RIGHTS

At any time, You may exercise Your right to request access to, rectification of, and, as the case may be, erasure of any Personal Data relating to You. You may also object to data processing or request a restriction of processing and benefit from a right to data portability, (as the case may be), in compliance with Data Protection Laws.



You may exercise Your rights by fulfilling a specific request form accessible on Our dedicated **Data Subject Rights online platform**. When You submit Your request, please mention that Your request concerns Personal Data which is processed in relation to the Ukraine Archive.

Whenever the processing of Your Personal Data is based on Your consent, You have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent made prior to such withdrawal. The consent can be withdrawn by fulfilling a specific request form accessible on Our dedicated **Data Subject Rights online platform** or by contacting the EBU at privacy@ebu.ch. As a Data Subject, You have a right to lodge a complaint with a supervisory authority (in particular in the Member State of the European Union of Your usual place of residence, Your place of work or the place where the violation occurred) if You consider that the processing of Personal Data relating to You infringes the applicable data protection laws.



CONTACT

WHO CAN YOU CONTACT FOR PRIVACY QUESTIONS OR CONCERNS?

If you have any questions or comments about this Privacy Notice or how We handle Your Personal Data, please address Your correspondence to:

UNION EUROPÉENNE DE RADIO-TÉLÉVISION/EUROPEAN BROADCASTING UNION (EBU)

L'Ancienne-Route 17A,
1218 Le Grand-Saconnex,
Geneva, Switzerland
privacy@ebu.ch

REPRESENTATIVE IN THE EUROPEAN UNION

We have designated EBU UER AISBL, Avenue des Arts 56, 1000 Brussels, Belgium as our representative in the European Union.



UPDATE AND REVIEW

This Privacy Notice is in effect as from November 2025 and replaces all previous versions. We reserve the right, at Our complete discretion, to change, modify, add, or remove portions of this Privacy Notice at any time. You will be notified of such changes by e-mail only if they reflect amendments with regards to processing of Your Personal Data. We encourage You to check this page periodically to read the most recent version of this Privacy Notice; continued use of the Ukraine Archive after posting of changes to these terms or after receiving an e-mail notification with regards to changes will mean that You acknowledge these changes.