

Eurovision News Ukraine Archive - Transparency Statement on the Processing of Personal Data in News Material

What is the Eurovision News Ukraine Archive (“Ukraine Archive”)?

The Ukraine Archive is a themed news archive collection created on the initiative of the European Broadcasting Union (EBU) and certain member organisations in response of the importance to preserve reliable information about the war in Ukraine.

The Ukraine Archive consists of a large collection of audio-visual and digital news material owned by certain EBU member organisations and other third parties. Its purpose is to preserve and document news coverage and support research, academic and journalistic work on a matter of major public interest, based on reliable and verified source material, in line with the missions of public-service media.

The Ukraine Archive is not publicly accessible. Access may be granted under strict conditions to qualified individuals (such as journalists, academics or researchers) who have legitimate research or informational purpose connected to the archived content, and on a restricted monitoring basis (viewing and/or listening only).

The EBU takes the protection of personal data seriously, in accordance with EU General Data Protection Regulation 2016/679/EU (“GDPR”), the Swiss Federal Act on Data Protection, and any other applicable data protection laws and privacy regulations (the “**Data Protection Laws**”). This transparency statement provides you with general information on how personal data contained in news material is processed in this context.

Who is responsible for this processing?

For the purposes of granting qualified individuals access to the Ukraine Archive, the EBU acts as independent data controller.

Contact details

European Broadcasting Union/Union Européenne de radio-télévision
L’Ancienne-Route 17A
1218 Le Grand-Saconnex, Geneva.
Switzerland
privacy@ebu.ch

Why does the Ukraine Archive contain personal data and where does it come from?

News reporting often includes images, voices, names or other personal information that make individuals identifiable. This is inherent to journalism and to documenting real-world events.

The personal data contained in the Ukraine Archive comes from news material owned by EBU members organisations and other third parties (“**Content Owners**”). These Content Owners collect, verify and publish news material as part of their journalistic activities and act as independent data controllers for that original processing. They are thus primarily responsible for transparency towards the individuals appearing in their news material, in accordance with Data Protection Laws, as the EBU does not collect personal data directly from such individuals.

For what purposes and on what legal basis is this processing carried out?

The Ukraine Archive involves making journalistic news material available to qualified individuals to enable research and informed understanding of events of major public importance through the support of research, academic, informational, and journalistic work connected to the archived content. It further contributes to the public interest, including the fight against disinformation and the preservation of historical records.

The processing of personal data contained in the news material is carried out:

- For **journalistic and archival purposes**, as recognized under Article 85 GDPR, which allow for exemptions or derogations from certain data protection rules to balance data

protection rights with the freedom of expression and information, including in the context of news archives.

- For **legitimate public interest** (Article 6(1)(f) GDPR), to preserve, document and enable research into events of major public interest (subject to appropriate safeguards and access limitations).

Why is no individual notice provided to individuals appearing in the news material?

The EBU does not provide individual privacy notices to each individual appearing in the news material available on the Ukraine Archive because:

- the personal data is not collected directly by the EBU but originates from the Content Owners and EBU has no direct relationship with such individuals;
- the volume of archived content and the number of individuals concerned would make individual notification disproportionate and impracticable; and
- the nature of the material is journalistic, often involving historical reporting and contextual coverage, and valuable for public interest.

The EBU therefore relies on Article 14(5)(b) GDPR, which allows, in the context of processing for archiving purposes in the public interest and historical research purposes, exemption from individual notification where doing so would require disproportionate effort from the data controller.

This Transparency Statement is made publicly available as an appropriate alternative transparency measure, so that anyone can understand the purpose of the Ukraine Archive and how personal data is handled in this context.

What safeguards are in place to protect individuals' personal data?

To protect the rights and interests of individuals appearing in the news material, the EBU has implemented a number of safeguards, including:

- Restricted access: the Ukraine Archive is not publicly accessible and is limited to approved qualified individuals.
- Contractual framework: access is subject to terms and conditions and strictly limited to viewing and/or listening purposes.
- Low resolution and watermark: the news material on the Ukraine Archive is provided in low-resolution and watermarked formats.
- Monitoring: monitoring and oversight by the EBU to ensure compliance with access conditions and prevent misuse.

How can data protection rights be exercised?

Individuals appearing in the news material should normally exercise their data protection rights directly with the Content Owner, who originally collects and publishes journalistic content.

If you have questions or concerns relating to your personal data contained in the news material available on the Ukraine Archive, you may also contact the EBU at privacy@ebu.ch. Where appropriate, the EBU will redirect requests to the relevant Content Owner.

Relationship with other privacy information

For the sake of clarity, this Transparency Statement is separate from the Ukraine Archive Privacy Notice, which applies exclusively to the processing of personal data relating to qualified individuals who apply for and access the Ukraine Archive.

This Transparency Statement may be updated from time to time to reflect changes in the Ukraine Archive or applicable legal requirements. The most recent version will be made available on the EBU website.