



INFORMATION UND KOMMUNIKATION  
DER REGIERUNG  
Fürstentum Liechtenstein

## Privacy policy

for the online presence of the Government of the Principality of Liechtenstein, the individual ministries, and the individual members of the Government on social media.

### 1. Introduction and information about the controller

The controller within the meaning of the EU General Data Protection Regulation (GDPR) is, depending on the online presence and designation on the respective online platform, the Government of the Principality of Liechtenstein, the relevant ministry, or the relevant member of the Government. Hereinafter, the operator of the respective online presence is referred to as the "controller".

Below, the controller informs you, in accordance with Articles 13 and 14 of the GDPR, about the manner and purpose of the processing of your personal data in connection with the activities of the controller in the context of the controller's online presence and presentation on social media. For the purposes of this notice, the terms "social networks" and "social media" are used synonymously.

In principle, social media are internet platforms that serve both the presentation of individuals and the networking, communication, and interaction between members of the platform, enabling the exchange of information among users.

#### 1.1 Controllers

##### **Information and Communications Unit of the Government (IKR)**

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9490 Vaduz  
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Phone: +423 236 76 69  
Email: [kommunikation@regierung.li](mailto:kommunikation@regierung.li)

##### **Prime Minister Brigitte Haas**

Peter-Kaiser-Platz 1  
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## **2. Channels used for online presence on social media**

The controller operates their online presence on one or more of the following social media platforms, thereby maintaining their publicly accessible presentation on the internet. The social media are the following platform service providers:

- **Facebook:** Government of the Principality of Liechtenstein; Brigitte Haas; Emanuel Schädler



- **Instagram:** regierungliechtenstein; medienakademie; brigittehaasvaduz; sabinemonauni; danieloehry\_li; hubertbuechel; emanuel\_schaedler
- **LinkedIn:** Government of the Principality of Liechtenstein; Brigitte Haas; Daniel Oehry; Hubert Buechel; Emanuel Schädler

The above linking of the accounts on [www.regierung.li](http://www.regierung.li) is accompanied by this privacy policy.

### 3. Purpose and legal basis of data processing

The controller's presentation in this way primarily serves to inform about current work and events within their area of responsibility, to create transparency regarding the country's policies and political decisions, without, however, seeking to engage in political dialogue via social media.

#### 3.1 Information on legal basis for processing of personal data

The online presence on social media complies with the legally prescribed information obligation of the controller and informs the public about the activities of the controller. The information obligations and thus the legal basis for the processing of personal data in the context of the online presence and the presentation on social media are Articles 3 and 13 of the Information Act, Articles 12 and 13 of the Information Ordinance, Annex 1 of the Government and Administration Organisation Ordinance, and Article 26a of the Ordinance on the Rules of Procedure of the Government, in connection with the exercise of official authority pursuant to Article 6(1)(e) of the GDPR.

Through your use of social media, your personal data is processed by the controller as the owner of the online presence page (fan page), by the processor swat.io, as well as by the respective platform service provider.

In addition, under certain circumstances, your data may be processed by third parties if data is transmitted by the platform service provider, and also by third parties who have access to or use the online presence and can therefore view your data, just as you can also view and process data of third parties on this basis alone.



### **3.2 Information on the purpose of data processing**

The purpose of the processing, initially in the form of the collection of your data by the controller, is to ensure the error-free provision of the relevant online presence on one of the above-mentioned platforms. Your data may be used for internal evaluations to improve the online presence and to analyse your user behaviour. A limited amount of processing also takes place when responses are posted to your comments, questions, or other interactions.

Details on data processing can be found in the other sections of this privacy policy, in particular under section 7.

## **4. Online editorial team of the controller**

The offices responsible for social media presentations, in the form of the online editorial team, are the Information and Communications Unit of the Government (IKR), and the members of the Government Brigitte Haas, Sabine Monauni, Daniel Oehry, Hubert Büchel, and Dr. Emanuel Schädler. The above-mentioned accounts are regularly updated by the responsible offices. This keeps the public informed about current events and the work activities of the controller. Our presentations are intended primarily to provide information, rather than to seek or conduct an active or detailed dialogue with you or the public.

Nevertheless, depending on the services offered by the respective platform service provider, you can voluntarily leave questions, remarks, and comments on our online presence page. However, as it is not our intention to conduct a detailed dialogue in this way, we ask for your understanding regarding our cautious approach to responding, and we would like to point out that urgent questions, and in particular questions concerning your private matters, should not be communicated via these platforms. Accordingly, our online presence should be regarded primarily as one-sided information on our part.

In particular, please also read the sections "Media etiquette", "Recommendations to you as the data subject", and our published netiquette (including under the following section).



## 5. Media etiquette

Employees of the IKR, as well as all other employees of the controller who act or respond via social networks as part of their professional duties, are trained in the publication of posts and in the appropriate handling of questions, answers, queries, and comments. In order to maintain fair conduct and avoid any infringements of the law, we proceed in accordance with the guidelines of our applicable media etiquette, known as netiquette.

## 6. Alternative provision of information and your voluntary use of social media

The presentation of the controller within their online presences on social media is merely to be understood as an additional place for the dissemination of information. In order to ensure that access to the controller's content is not dependent on prior registration with one or more social media platform service providers, the information is also published via other communication channels. This applies to most information, but excludes content that, due to its nature, can only be made available on social media.

The Government's other communication channels include the website [www.regierung.li](http://www.regierung.li) and the associated media portal <https://regierung.li/medienportal/16175/medienportal>, the National Television Channel, Teletext, and [www.presseportal.ch](http://www.presseportal.ch).

The information that individual ministries or members of the Government publish on social media is not necessarily published via the Government's other communication channels. This is particularly the case when it concerns party-political or personal content.

This means that in most cases it is up to you to decide whether you voluntarily use social media, which will have an impact on the processing of your personal data. Simply by accessing social media, the various platform service providers begin to collect and process your data, whether or not you are registered with them.



It should also be noted that information relating to Government activities is also published outside the Government's area of responsibility. This includes the actors in Liechtenstein's media landscape (newspapers, online, radio, TV), as well as media based abroad. These media receive the Government's official releases from the IKR and then decide independently which information to publish.

## **7. Data processing and source of the data**

The controller's own presentation on social media and the mere dissemination of content without any personal reference, combined with the possibility that you may respond with comments or questions, results in only a limited amount of data processing by the controller itself.

When you interact or communicate with other users, only the data that you and the parties involved in the communication have published and provided voluntarily will be processed.

The following personal data is collected, recorded, and processed in the course of the controller's activities as soon as you access and interact with social media:

- username, account ownership
- information on your account as a user, such as posts, comments, likes, photos, video material, etc.
- IP address
- metadata
- locations
- browsers used (type, version), server name, provider, operating system used
- visitor statistics, date, time, length of visit, pages viewed, previously visited pages
- data volume transmitted
- interactions such as comments, likes, questions, etc.

Through your use of social media, you are therefore initially the source of the personal data processed by the controller. However, the social media themselves subsequently serve as the source of your personal data, which the platform service providers use and also process.



According to a judgment of the European Court of Justice (ECJ; judgment of 5 June 2018, C-210/16), the operators of fan pages, together with the respective platform service provider, are considered joint controllers within the meaning of the GDPR. Therefore, we inform you here about the essential data processing carried out by the respective platform service providers.

As soon as you access social media as a user, the various platform service providers generally begin to collect and process your data, whether or not you are registered with them. A distinction must be made between users who also have a profile on social media (members) and users who are merely visitors to the fan pages (non-members). Personal data is processed in both cases, and significantly more in the case of profile owners or members, i.e. all data you publish yourself, or that is published about you by friends, followers, and others, is further processed and may be exchanged between various platform service providers. In addition, the platform service providers create the most comprehensive possible profiles of all natural persons – members and non-members alike – and continuously expand them.

Social media generally analyse user behaviour comprehensively when their website, or a website containing specific plug-ins such as like buttons or advertising banners of the respective platform service provider, is visited and, where applicable, interacted with. The controller's presence and online profile on social media are also hosted on the websites of the respective platforms, meaning that numerous data protection-relevant processing operations are triggered when these platforms are accessed. In other words, various personal data is collected, recorded, and processed by the platform service providers.

It is now an essential part of the business model of such platforms, which are often based on profile-based technical solutions, to collect, systematically store, profile, and further utilise the personal data of their members and, where applicable, other persons who are not members.

Further information on data processing by platform service providers can be found in their respective privacy policies:

- [https://www.facebook.com/privacy/policy/?entry\\_point=data\\_policy\\_redirect&entry=0](https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0)



- [https://help.instagram.com/519522125107875/?maybe\\_redirect\\_pol=0](https://help.instagram.com/519522125107875/?maybe_redirect_pol=0)
- <https://www.linkedin.com/legal/privacy-policy>

## **8. Processors and description of analysis**

### **8.1 Social media management tool**

Swat.io GmbH is the Government's processor and supports the IKR with an online social media management tool for managing the Government's channels on the Facebook and Instagram platforms. Support is also provided for the accounts of individual members of the Government. Swat.io is an independent bootstrap technology company in the Software-as-a-Service sector, based in Vienna, Austria.

The online platform makes it possible to create and schedule content in a kind of calendar. The IKR is informed of new comments, messages, and mentions via a ticket system, both within the swat.io system and by email. These comments, messages, and mentions are recorded and displayed by swat.io. The IKR archives the tickets. No comments or messages are answered.

A statistics section provides the most important social media key figures at a glance. This gives the IKR a detailed analysis of the community, content, individually set tags (which are not used), tickets, and team members to measure the success of the social media strategy. The collected data can be exported for further use and processing (as a PDF or Excel spreadsheet). User data and sentiment can also be analysed. With the sentiment analysis and personal statistics, the IKR can see which users react positively or negatively to posts. Tags and internal comments can be used to identify individuals.

Contact details of the processor:

Swat.io GmbH

Schönbrunner Straße 213-215, 3. Stock

1120 Vienna, Austria



## 8.2 Preparation of content and images

The IKR uses Canva to create various visual content on social media. Canva is a graphic design platform that operates on the drag-and-drop principle. It contains templates, images, fonts, and graphic elements that can be used by users.

## 9. Recommendations to you as the data subject

If you have your own user account in a social network and you are logged in to your user account when you visit our online presence in that social network, all data collected and recorded in the process will be assigned directly to your existing user account.

- We therefore recommend that you regularly log out completely after using a social network.

However, it cannot be ruled out that your personal data may also be collected if you are not logged in or do not have an account with the respective social network or platform service provider. This type of data collection can take place via cookies, which are stored on your device and also record your IP address.

- We also recommend that you be aware of how you handle your data. Remember that, in particular, all your messages, images, and comments remain stored on the servers of platform service providers such as Facebook, Instagram, and others.
- Delete the cookies stored on your computer or the device you are using, or set your browser to do so automatically when you close it.
- Another option is to access and use the platform service providers only via a separate browser.

## 10. Minimise risks by taking proactive measures

As a user of a platform service provider, you can at least contribute to reducing the processing of your data and thus minimising the risk by taking certain measures. When using social media, there is usually no obligation to register your own and/or full name or to identify yourself in any other way, for example via your actual telephone number. As a user, you are also primarily responsible for publishing any questions or comments of your own. You can also protect yourself through



various settings and measures, for example by deleting your browser history, deactivating cookies, or not sharing your location when using photos. You can also delete the metadata of your photos before uploading and sharing them on the internet.

## **11. Storage and erasure**

The storage period for data processing is based on specific legal requirements regarding retention periods and the Archives Act. If the purpose of the data processing has been fulfilled and there are no legal retention periods preventing the deletion of your data, the personal data will generally be handled in accordance with the applicable erasure policy.

However, it is important for you to know that the internet does not forget. This means that, should you interact on our social media, it is beyond our control and responsibility if third parties appropriate these interactions, copy, forward, save, or otherwise process them in any way.

## **12. Risk awareness**

The use of social media via services such as our public presence and our online presence has an impact on your personal rights, in particular regarding the evaluation of your data by the respective platform service provider. This is demonstrably primarily for advertising purposes, but also to create general profiles of all users, with far-reaching consequences that are not necessarily apparent to you. Users of social media are monitored from the very first moment, profiles are created, your data is utilised, and you are manipulated or attempts are made to manipulate you, including through the targeted provision of selected information and content.

When using social media, you should therefore be aware of the consequences of disclosing personal information about yourself, your family members, friends, acquaintances, or other people online. This information can be accessed worldwide, and it is almost impossible to completely remove content once it has been posted online, such as opinions, videos, images, or information about leisure activities, habits, or personal preferences. If your posts are linked to your real name, this information can easily be tracked, monitored, and used across platforms via search engines.



Although you can ensure or improve the protection of your privacy when using social media to a certain extent by adjusting the settings in your own user account, you are also reliant on the respective platform providing such options, actually implementing them, and maintaining them over time. It is now undisputed and obvious that the currency of most social media platforms, which are generally available free of charge, is your own personal data. As a rule, your data is passed on directly or indirectly to companies that pay for it and are primarily interested in your user behaviour. Here too, your data is often used for further profiling. You should also always be aware that your personal data may be hacked at the platform service provider, meaning there is a risk of a potential data leak. It remains questionable how transparently platform service providers deal with data protection incidents, and whether you will always be informed immediately so that you can, for example, change your password without delay.

### **13. Data transfer to the United States and other third countries**

We also use platform service providers that are based in the United States of America or belong to a group whose headquarters or parent company is located in the United States. Due to the new adequacy decision of the European Commission on the EU-US Data Privacy Framework of 10 July 2023 (EU-US DPF), data transfers to the United States are possible. Even if we do not actively transfer your data ourselves, this may be carried out by one of the platform operators. It can therefore be assumed that some of the social media platform service providers we use are very likely to transfer your data to the United States and process it there as well. We have no influence over these processing activities.

### **14. Further information on data protection and your rights**

Further information on data protection in general, and your rights as a data subject in particular, can be found in the privacy policy at:

- <https://www.regierung.li/text/16241/datenschutzhinweis>
- <https://www.llv.li/en/navigation/footer-nav/privacy-policy>