CNS 36/2021

Opinion in relation to the inquiry made by a Department about the possibility of publishing telephone numbers and email addresses on the Department's website.

A letter from a Department is presented to the Catalan Data Protection Authority about the possibility of publishing telephone numbers and email addresses on the Department's website.

The Department explains that given the receipt by the General Directorate of several requests for dissemination regarding certain personal data of professional location, the possibility of publishing on its website the telephone numbers and e-mail addresses of the registered persons is considered in the Registry. The query is referred to an annex that details the type of data that would be published on the website: name of the establishment, industrial address of the establishment, telephone, email address, website, assigned number of the RIAAC, agri-food sector, description of the registered activities, direct link to the map location and geographic location coordinates of the industry.

The following questions are raised:

"First Question.- In the framework of the processing of dissemination through the Department's website, the legal definition of personal data in article 4.1 of the RGPD, must be interpreted in the sense that telephones and e-mails if the company/entrepreneur is a natural person and these are disseminated, so that they are related or linked to other data identified in the Annex, are they personal data?. Likewise, the previous article 4.1 must be interpreted in the sense that the e-mail address if it contains references to names and surnames of a natural person is personal data in itself?.

Second Question.- Given that the powers of development of the agri-food sector and economic promotion are, conceptually, recognized within the framework of an Organic Law (articles 116 and 152 of the EAC, respectively) and developed, by regulation, through the attribution by Decree, among others, of the functions of promoting quality agri-food products (article Decree 43/2017), it is necessary to interpret articles 6.1 e) and 6.3 of the RGPD in conjunction with article 19.3 of the LOPDGDD, in the sense that they are not an adequate and sufficient legal basis to recognize the lawfulness of the treatment described in the previous sections consisting in the dissemination on the DARP website of telephone numbers and/or email addresses together with the data list in Annex?.

Third Question.- Article 19.3 of the LOPDGDD must be interpreted in the sense that the dissemination of e-mail and telephone data in the circumstances described is necessary for the exercise of powers to develop the agri-food sector and of economic promotion (articles 116 and 152 of the EAC) or for the development of the functions of promotion of quality agri-food products (article 43.1 c) of Decree 43/2017)?

Fourth Question.- Can the dissemination of e-mail addresses and telephone numbers through the website of the Department for professional localization be legally based on the consent of the interested parties?

Fifth Question.- The principle of data minimization must be interpreted in the sense that an eventual web dissemination based on consent is permissible, of telephone numbers and email addresses together with the data identified in the Annex, when this is carried out to the extent strictly necessary for the development of the agri-food sector and for the economic promotion of the agri-food sector (articles 116 and 152 of the EAC) and/or for the promotion of quality agri-food products (article 43.1 c) of Decree 43/2017)?

Sixth Question.- In the event that the processing consisting of the dissemination of e-mail and telephone addresses can be based, legally, on the consent of the interested party (Article 6.1. a) of the RGPD), the drafting of the model of consent form - in the authorization part - described in the previous section, does it meet the requirements, legally, required for consent in the field of personal data protection? Aside from the drafting of an appropriate information form at the time of data collection, what precautions and/or additional measures should be taken to guarantee free, specific, informed and unequivocal consent? Aside from adequate prior information at the time of collection, would it be enough to put in place an adequate and effective withdrawal mechanism?"

Having analyzed the query, which is not accompanied by any document, and given the current applicable regulations, and having seen the report of the Legal Counsel, the following report is issued.

I

(...)

II

Before entering into a concrete analysis of the inquiries made by the Department, it should be emphasized that the references made in this report to the persons registered in the Register of agricultural and food industries, regulated in Decree 302/2004, of 25 of May, by which the operation of the Register of Agricultural and Food Industries of Catalonia (hereafter RIAAC) is created and approved refer exclusively to natural persons, given that the data of legal persons are excluded from the subjective scope of application of the RGPD, in accordance with article 1 RGPD which states that "This Regulation establishes the rules relating to the protection of natural persons with regard to the treatment of personal data and the rules relating to the free circulation of such data. 2. This Regulation protects the fundamental rights and freedoms of individuals and, in particular, their right to the protection of personal data. (…)".

In this sense recital 14 of the RGPD specifies that "The protection granted by this Regulation must apply to natural persons, regardless of their nationality or place of residence, in relation to the treatment of their personal data.
This Regulation does not regulate the processing of personal data relating to persons

legal entities and in particular to companies established as legal entities, including the number and form of the legal entity and its contact details".

III

The Department asks in its first question whether "within the framework of the processing of dissemination through the Department's website, the legal definition of personal data in article 4.1 of the RGPD, must be interpreted in the sense that telephones and e-mails if the company/entrepreneur is a natural person and these are disseminated, so that they are related or linked to other data identified in the Annex, are they personal data?. Also, should the previous article 4.1 be interpreted in the sense that the e-mail address if it contains references to names and surnames of a natural person is personal data in itself?

Article 4.1 of the RGPD defines what is meant by personal data "all information about an identified or identifiable natural person ("the interested party"); Any person whose identity can be determined, directly or indirectly, in particular by means of an identifier, such as a number, an identification number, location data, an online identifier or one or more elements of identity, shall be considered an identifiable physical person physical, physiological, genetic, psychological, economic, cultural or social of said person".

According to this definition, personal data is information related not only to an identified natural person but also to a natural person who can be identified directly or indirectly from certain information.

In this sense recital 26 of the RGPD specifies that: The principles of data protection must be applied to all information relating to an identified or identifiable natural person. Pseudonymized personal data, which could be attributed to a natural person through the use of additional information, must be considered information about an identifiable natural person. To determine whether a natural person is identifiable, all means, such as identification, that can reasonably be used by the data controller or any other person to directly or indirectly identify the natural person must be taken into account. To determine whether there is a reasonable probability that means will be used to identify a natural person, all objective factors must be taken into account, such as the costs and time required for identification, taking into account both the technology available at the time of the treatment like technological advances."

Regarding the telephone number when it is directly or indirectly linked to a natural person, it will be considered personal data and, consequently, its treatment is subject to the rules and principles of the RGPD.

With regard to the email address, this may include certain information about the owner, such as the name and surname, initials, position, identification number, etc. This would be what we could call "personalized addresses". In these cases the email address directly identifies the person holding the account. In other words, it is information about an identified natural person and would therefore be personal data.

We can also find "non-personalized" e-mail addresses, that is to say, those that, although they are addresses linked to an e-mail account of a particular natural person, the e-mail address does not appear to contain information about its owner to use, for example, an abstract or meaningless alphanumeric combination. In these cases, the address alone does not identify the person who owns it, but it can be easily identified, without a disproportionate effort, either because the address can appear together with other data that allows identification, either because content of the message, either through the data available to the mail server. This type of address must also be considered personal data under the terms of the RGPD, as they allow the person holding the data to be indirectly identified.

Finally, we can find "generic" addresses, that is to say, those addresses that correspond to a generic account, of shared use or of an area of the organization. In these cases the email address cannot be linked to an identified or identifiable natural person, but can be addressed by different users and, in principle, cannot be considered personal data. However, it cannot be ruled out in these cases either, depending on the structure of the organization (for example in one-person units, or cases in which access to mail is limited to a single responsible person) that may give cases of linking a generic address with an identified or identifiable person, in which case the electronic address could also be personal data.

In accordance with this, the Department must take into account that the telephone and the email address, with the exception mentioned regarding generic addresses, are personal data in accordance with the data protection regulations and, consequently, its treatment is subject to the rules and principles of the GDPR.

IV

Secondly, it is necessary to answer the fourth and sixth questions of the consultation, referring to the possibility of basing the treatment on consent.

The fourth question asks the following:

"Can the dissemination of e-mail addresses and telephone numbers through the website of the Department for professional localization be legally based on the consent of the interested parties?"

And in the sixth question, the Department proposes:

"In the event that the processing consisting of the dissemination of e-mail and telephone addresses can be based, legally, on the consent of the interested party (Article 6.1. a) of the RGPD), the drafting of the model form of consent - in the part of the authorization - which is described in the previous section, meets the requirements, legally, required for consent in the field

of the protection of personal data? Aside from the drafting of an appropriate information form at the time of data collection, what precautions and/or additional measures should be taken to guarantee free, specific, informed and unequivocal consent? Aside from adequate prior information at the time of collection, would it be enough to put in place an adequate and effective withdrawal mechanism?".

It must be taken into consideration that, in order to be considered valid, the consent must meet the requirements established by the RGPD. In accordance with article 4.11 RGPD, consent must consist of a "specific, informed and unequivocal manifestation of free will by which the interested party accepts, either through a statement or a clear affirmative action, the data processing that they concern him".

In the specific case of public administrations, due to the situation of imbalance between the parties, so that consent can be considered as free consent, the affected person must have a real ability to choose. In other words, that there are no negative consequences in your relationship with the administration for not having given your consent.

In addition, consent must be specific. Article 6.1.a) of the RGPD provides that the treatment will be lawful if "the interested party gives his consent for the treatment of his personal data for one or several specific purposes;". In other words, the citizen must know with a sufficient level of concreteness what he is consenting to, so that he can foresee the consequences of consent.

For its part, article 7.2 of the RGPD, relating to the conditions for treatment, establishes that "If the consent of the interested party is given in the context of a written statement that also refers to other matters, the request of consent will be presented in such a way that it is clearly distinguished from the other matters, in an intelligible and easily accessible form and using a clear and simple language. No part of the declaration that constitutes an infringement of this Regulation will be binding."

And recital 43 of the RGPD provides that "(...) Consent is presumed not to have been given freely when it does not allow separate authorization of the different operations of personal data processing despite being adequate in the specific case, or when the fulfillment of a contract, including the provision of a service, is dependent on consent, even when it is not necessary for said fulfillment."

In turn, sections 1 and 2 of article 6 of Organic Law 3/2018, of December 5, on the protection of personal data and guarantee of digital rights (hereinafter, LOPDGDD), referring to the treatment based on the consent of the person affected, establish that:

"1. In accordance with the provisions of article 4.11 of Regulation (EU) 2016/679, the consent of the affected person is understood as any manifestation of free, specific, informed and unequivocal will by which the latter accepts, either through a statement or a clear affirmative action, the processing of personal data concerning you.

2. When it is intended to base the processing of the data on the consent of the affected person for a plurality of purposes, it is necessary to state specifically and unequivocally that this consent is granted for all of them."

It should not be forgotten that article 5.1.a) of the RGPD states that personal data must be treated in a loyal manner in relation to the person concerned. Linked to this principle, and as indicated by this Authority in opinion CNS 4/2020, "the choice of this legal basis will determine the regime applicable to the treatment in question, therefore, if the person in charge decides to base the treatment in consent, you must be prepared to respect this option. Thus, for example, you must bear in mind that, in the event that the affected person withdraws his consent, he will have to stop processing his data or that, in the event of subsequent problems with the validity of the consent granted by him, he will not be able retrospectively resort to another legal basis in order to justify the treatment in question."

That is to say, in a case like the one we are dealing with, it cannot be ruled out that the treatment consisting in the dissemination of contact data and other data provided for in the Annex of the consultation may be based on the consent of the persons affected persons who so express it, as long as they have been adequately informed, in accordance with article 13 of the RGPD, and to the extent that their refusal does not entail any negative consequences for them, beyond those arising from their own lack of dissemination In any case, consent must be able to be withdrawn at any time through a means that does not require disproportionate effort.

However, it should be noted that, despite the fact that consent may be a valid legal basis in this case, the treatment must also comply with the rest of the principles provided for in the RGPD. Specifically, and for what interests us now, it will have to respect the principle of minimization. From the point of view of this principle, and given the purpose of the publication, it does not seem that the dissemination of the assigned number of the .

The query also refers to the existence of doubts regarding the right to information.

In accordance with article 12 of the RGPD, it is up to the data controller to take the appropriate measures to provide the interested party with the information indicated in articles 13 and 14 of the RGPD in a concise, transparent, intelligible and easy access

In the case at hand, at the time of collecting the information, it will be necessary to inform the interested parties about the conditions under which the processing of personal data is carried out (article 13 RGPD and 11 of the LOPDGDD), especially about the purpose or purposes for which the data will be processed.

The information must refer to: - The
identity and contact details of the person in charge and, where appropriate, of their representative.
- The contact details of the data protection officer.
- The purposes and legal basis of the treatment.
- The recipients or categories of recipients of the data.
- The intention to transfer the data to a third country or an international organization and the basis for doing so, if applicable.
- The term during which the data will be kept or the criteria to determine it.

- The right to request access to the data, to rectify or delete it, to limit its processing, to oppose it and to request its portability.
- The right to withdraw at any time the consent that has been given.
- If the communication of data is a legal or contractual requirement or a requirement necessary to sign a contract, and if the interested party is obliged to provide the data and is informed of the consequences of not doing so.
- The right to submit a claim to a control authority, or, where appropriate, to the Data Protection Officer.
- The existence of automated decisions, including profiling, and information on the logic applied and its consequences.

For its part, sections 1 and 2 of article 11 of the LOPDGDD, regarding transparency and information of the affected, provide the following:

"1. When the personal data is obtained from the affected person, the controller can comply with the duty of information established by Article 13 of Regulation (EU) 2016/679 by providing the affected person with the basic information referred to in section below and indicating an electronic address or other means that allows you to access the rest of the information in a simple and immediate way.

2. The basic information referred to in the previous section must contain, at least: a) The identity of the data controller and his representative, if applicable. b) The purpose of the treatment. c) The possibility of exercising the rights established by articles 15 to 22 of Regulation (EU) 2016/679.

If the data obtained from the affected person must be processed for profiling, the basic information must also include this circumstance. In this case, the affected person must be informed of his right to object to the adoption of automated individual decisions that produce legal effects on him or significantly affect him in a similar way, when this right is given in accordance with the provisions of article 22 of Regulation (EU) 2016/679."

This information must be given in an accessible and easy-to-understand form, with simple and clear language, indicating why this data is collected, used or processed, as required by the RGPD. In this regard, it may be of interest to consult the Guide for the fulfillment of the duty to provide information in the RGPD (http://apdcat.gencat.cat/ca/documentacio/guies_basiques).

v

With regard to other avenues for legitimation by the Department for the publication of this data on its website (corresponding to the second, third and fifth questions raised by the Department), the following considerations must be taken into account.

As a preliminary matter, it should be noted, as the Department highlights, that the telephone and email address data were mandatory data that had to be provided by the

industrial establishments to register their activities. Article 8.1 of Decree 302/2004 provides that the Register "will contain the basic and complementary data required by articles 4 and 6, respectively, of Decree 324/1996, of October 1, which approves the Regulation of the Registry of Industrial Establishments of Catalonia.(...)". And, article 4 a) of Decree 324/1996, of October 1, provided that, among the data relating to the company, industrial establishments had to enter, among other data, "the telephone, fax and email address". The data entered had to be permanently updated (article 2 Decree 302/2004).

However, Decree 324/1996 was repealed, in its entirety, by the second Derogatory Provision, section d) of Law 11/2011, of December 29, on the restructuring of the public sector to speed up administrative activity, without that it is recorded that the legal loophole that supposes the repeal of the rule referred to in article 8.1 of Decree 302/2004 has subsequently been completed.

Having said that, in order to focus the answer to the queries raised, it is necessary, first of all, to mention the initial purpose of the processing of the RIAAC data by the Department and to analyze whether the processing of the data contained therein is compatible to the ulterior purpose pursued with the creation of this contact data relationship (telephone and email and other data listed in the inquiry annex) that is to be published on the web.

Decree 302/2004, of 25 May, which creates and approves the operation of the Register of Agricultural and Food Industries of Catalonia (RIAAC) provides in Additional Provision 2 that: "The Departments of Agriculture, Livestock and Fisheries and Labor and Industry will establish the necessary processes in order to include in the Register of Agricultural and Food Industries of Catalonia the data of the industries that currently appear in the Register of Industrial Establishments of Catalonia and that should be entered in the RIAAC which becomes the industrial register of these companies.

Both the Department of Agriculture, Livestock and Fisheries and the Department of Labor and Industry will have access to the RIAAC data, and in the field of forest industries the Department of Environment and Housing."

Article 1 of this Decree provides:

"The Register of Agricultural and Food Industries of Catalonia (RIAAC) is created, henceforth Register, organically dependent on the General Directorate of Production, Innovation and Agri-Food Industries of the Department of Agriculture, Livestock and Fisheries, which will be digital. ".

The purpose of the Register is (article 2):

"Having permanently and updated all the necessary information on the food, agricultural, livestock, forestry and fishing industries in order to allow the control and promotion policies that are the responsibility of the Department of Agriculture, Livestock and Fishing to be carried out , and in the field of forest industries the Department of Environment and Housing".

According to the query, the publication of the telephone number and email address of the people registered in the Registration, would have the purpose of "professional localization as a factor linked to the

development of the promotion functions of quality agri-food products, as well as the control and promotion functions to which the RIACC responds".

In accordance with the principle of purpose limitation (Article 5.1.b) of the RGPD), the data must be collected for specific, explicit and legitimate purposes and subsequently must not be treated in a manner incompatible with these purposes.

However, article 6.4 of the RGPD provides:

"When the treatment for a purpose other than that for which the personal data was collected is not based on the consent of the interested party or on the Law of the Union or of the Member States that constitutes a necessary and proportionate measure in a democratic society for to safeguard the objectives indicated in article 23, paragraph 1, the person responsible for the treatment, in order to determine whether the treatment with another purpose is compatible with the purpose for which the personal data was initially collected, will take into account, among other things: a) any relationship between the purposes for which the personal data have been collected and the purposes of the subsequent treatment provided; b) the context in which the personal data have been collected, in particular with regard to the relationship between the interested parties and the controller; c) the nature of personal data, in particular when special categories of personal data are treated, in accordance with article 9, or personal data relating to criminal convictions and infractions, in accordance with article 10; d) the possible consequences for the interested parties of the planned subsequent treatment; e) the existence of adequate guarantees, which may include encryption or pseudonymization."

Regarding this, recital 50 of the RGPD provides that: "The processing of personal data with purposes different from those for those that have been initially collected must only be permitted when it is compatible with the purposes of its initial collection. In such a case, a separate legal basis is not required, other than the one that allowed the personal data to be obtained. If the treatment is necessary for the fulfillment of a mission carried out in the public interest or in the exercise of public powers conferred on the person responsible for the treatment, the tasks and purposes 7 for which the further treatment must be considered compatible and lawful can be determined and specify in accordance with the Law of the Union or Member States. Subsequent processing operations for archival purposes in the public interest, scientific and historical research purposes or statistical purposes must be considered compatible lawful processing operations. The legal basis established in the Law of the Union or of the Member States for the treatment of personal data can also serve as the legal basis for the subsequent treatment. In order to determine whether the purpose of the subsequent treatment is compatible with the purpose of the initial collection of personal data, the person responsible for the treatment, after having fulfilled all the requirements for the authorization of the original treatment, must take into account, among other things , any relationship between these purposes and the purposes of the intended subsequent treatment, the context in which the data were collected, in particular the reasonable expectations of the interested party based on their relationship with the person responsible for their subsequent use, the nature of the data personal, the consequences for the interested parties of the planned subsequent tr

For this reason, it is necessary to analyze the compatibility of the use of the data collected in the RIAAC with a new purpose, such as publishing on the web the telephone and electronic address data of industrialists together with other data referred to in the query.

In this sense, article 6.4 of the RGPD establishes that when the treatment for a purpose other than that for which the data were collected is not based on the consent of the interested party or on a rule for the safeguarding of the objectives indicated in article 23.1 of the RGPD, to determine the compatibility of the initial treatment with the subsequent treatment, the person responsible for the treatment will take into account, among other aspects: any relationship between the purposes for which have collected the data and the purposes of further processing, the context of the data collection, the nature of the data, the possible consequences for the interested parties and the existence of adequate guarantees.

If the consent of the affected persons is not counted, nor is there a law that provides for the use of the RIACC data for this purpose, as seems to be the case in the case at hand, it will be necessary to carry out the planned compatibility analysis in article 6.4.

A first element to take into account, in a very special way, in this compatibility judgment are the provisions contained in article 19.3 of Organic Law 3/2018, of December 5, on the protection of personal data and guarantee of digital rights (LOPDGDD).

Article 19 LOPDGDD establishes the following:

"1. Unless proven otherwise, the treatment of contact data and, where appropriate, those relating to the function or position performed by individuals who provide services in a legal entity provided that the following requirements are met:

a) That the treatment refers only to the data necessary for its location professional

b) That the purpose of the treatment is solely to maintain relations of any kind with the legal entity in which the affected party provides its services.

2. The same presumption will operate for the treatment of data relating to individual entrepreneurs and liberal professionals, when they refer to them only in that condition and are not treated to establish a relationship with them as natural persons.

3. Those responsible or in charge of the treatment referred to in article 77.1 of this organic law may also treat the data mentioned in the two previous sections when it derives from a legal obligation or is necessary for the exercise of their powers."

Given the purpose for which the contact data is to be published, and that the Department would be part of the entities listed in article 77.1 LOPDGDD, the provision of article 19.3 of the LOPDGDD seems to be able to justify the compatibility of the dissemination of contact data. And this could cover much of the data listed in the query annex. Specifically, the provisions of article 19.3 would enable the publication of the name of the establishment, the industrial address of the establishment, telephone, email address, website, direct link to the location on the map and geographical location coordinates of the industry

However, the provisions of article 19.3 do not seem to be able to cover the publication of some other data appearing in the annex, such as those relating to the assigned number of the RIAAC, the agri-food sector or the description of the activities registered

Focusing on the first criterion referred to in article 6.4 of the RGPD, that is, the relationship between the purposes for which the personal data have been collected and the purposes of the subsequent treatment envisaged, must take into account that the purpose of processing the data of the RIAAC is to have in a permanent and up-to-date manner all the necessary information of the food, agricultural, livestock, forestry and fishing industries in order to allow carrying out the policies of control and promotion which are the responsibility of the Department of Agriculture, Livestock and Fisheries, and in the field of forest industries the Department

The publication of the data on the web, as can be deduced from the request for an opinion, would be necessary for the exercise of the powers of development of the agri-food sector and economic promotion or for the promotion of quality agri-food products, which it could include, among others, the activities tending to promote and give visibility to the agri-food industries and the products made in front of consumers or third companies.

It should be remembered, in this sense, as pointed out by the Department, that in accordance with article 43.1.c) of Decree 3/2017, of May 2, restructuring the Department of Agriculture, Livestock, Fisheries and Food corresponds in the General Directorate of Food, Quality and Agri-Food Industries to plan and supervise the actions of organizing, promoting and promoting quality agri-food products and/or with mentions of quality, food crafts, fairs, markets, agri-food product competitions, networks of agro-shops and consumption habits of food products.

Regarding the context in which the data were collected, article 5 of Decree 302/2004 provides for the obligation to register with the RIAAC. Therefore, when registering the company, it is mandatory to provide the data that will subsequently be recorded in the RIAAC. On the other hand, the Decree does not provide for the use of the data in the register in order to give visibility and facilitate the contact of third parties with the registered companies. In this context, giving visibility, providing information on the agri-food sector in which the company operates or the description of the registered activities can be fully justified. On the other hand, and from the point of view of the minimization principle, it does not seem that the dissemination of the assigned number of the RIAAC can be considered justified.

With regard to the possible consequences for the interested parties of the subsequent treatment envisaged, the use of the contact information listed in the RIAAC in order to give visibility to the company, in principle it does not seem that they should be negative, but rather to on the contrary, given that in a sector such as the agri-food industry, any company is in principle interested in its visibility. However, it cannot be ruled out that in some specific case facilitating the exact location of the industry could lead to some type of damage.

In any case, these two elements, relating to the context in which the data is collected and the consequences for the affected persons, may justify adopting, as an adequate guarantee for the rights of the persons, that prior to the publication of the data is communicated

this circumstance to the people affected, so that if they consider it appropriate they can ask for their exclusion from public broadcasting.

Taking this into account, the publication of contact data (name of the establishment, industrial address of the establishment, telephone, email address, website, direct link to the location on the map and geographical location coordinates of the industry) can find qualification in article 19.3 LOPDGDD. And the dissemination of data relating to the agri-food sector in which the company operates or the description of the registered activities, can be considered compatible in view of article 6.4 RGPD, if the appropriate guarantee is adopted has referred

In accordance with the considerations made in this report in relation to the query raised, the following are made,

Conclusions

The telephone number and the email address, whenever it can be directly or indirectly associated with a natural person, are personal data whose treatment must be adapted to the principles and guarantees of the data protection regulations.

The publication of data relating to the name of the establishment, the industrial address of the establishment, telephone, email address, website, direct link to the location on the map and geographical location coordinates of the companies registered in the RIAAC, may based on the consent of the affected persons.

The dissemination of this data can also be based on the provisions of articles 19.3 LOPDGDD and 6.4 RGPD, as long as the affected persons are offered the possibility to request the exclusion of their company from the dissemination