

**NOTIFICATION TO THE DATA PROTECTION OFFICER
(ARTICLE 31 REGULATION 2018/1725)**

NAME OF PROCESSING ACTIVITY¹: [Insurance policy and assistance covering the risks in connection with work-related travel](#)

1) Controller(s)² of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA)</p> <p>Organisational unit responsible³ for the processing activity: Unit A.1 Human Resources and Internal Support</p> <p>Contact person: Cristina Romay Lopez, Head of Unit 4.1 Human Resources and Internal Support</p> <p>Data Protection Officer (DPO): Radostina Nedeva-Maegerlein: dpo@emsa.europa.eu</p>
2) Who is actually conducting the processing? (Article 31.1(a))⁴
<p>The data is processed by EMSA itself x</p> <p>The organisational unit conducting the processing activity is: Unit 4.1 Human Resources and Internal Support</p> <hr/> <p>The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party x</p> <p>Externally contracted insurance company</p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p>

¹ **Personal** data is any information relating to an identified or identifiable natural person, i.e. someone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. This information may, for example, be the name, date of birth, a telephone number, biometric data, medical data, a picture, professional details, etc.

Processing means any operation or set of operations which is performed on personal data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

² In case of more than one controller (e.g. joint operations), all controllers need to be listed here

³ This is the unit that decides that the processing takes place and why.

⁴ Is EMSA itself conducting the processing? Or has a provider been contracted?

Frédéric Quartier, Client Manager, CIGNA International Health Services, Platin em Moretuslei 299,
B-2140, Antwerpen, Belgium
Email: frederic.quartier@cigna.com

3) Purpose of the processing (Article 31.1(b))

Why are the personal data being processed? Specify the rationale and underlying reason for the processing and describe the individual steps used for the processing.

The personal data are being processed in order to provide insurance coverage for staff members going on mission to represent EMSA at meetings/attending trainings/participating in conferences/carrying out inspections and visits etc. Trainees and external experts may on occasion be asked to go on mission for EMSA. For practical reasons, EMSA may also organise the missions for representatives from third countries.

Staff are covered under the policy in regard to medical assistance, luggage and personal/professional effects, early return/extended stay, life/invalidity insurance and legal assistance during an official mission for which an official mission statement is issued EMSA. The insurance & assistance cover lasts from the beginning to the end of the mission according to the dates mentioned on the mission order or equivalent.

In normal circumstances for regular missions, no personal data is transmitted to the insurer. It is only in the case that a claim is to be made in one of the situations mentioned above, subsequent to the mission, that a staff member must submit a claim form to the insurer with a limited amount of personal data, as mentioned under section 6 below. In the event of a mission to a high-risk location, certain personal data must be provided up front, as also mentioned in section 6 below.

4) Lawfulness of the processing (Article 5(a)–(d)): Processing necessary for:

Mention the legal basis which justifies the processing

- (a) a task carried out in the public interest or in the exercise of official authority vested in EMSA (including management and functioning of the institution) x
(Examples of legal basis: e.g. Article 2 'Core tasks of the Agency', par.4 b) EMSA founding regulation)
Regulation (EC) No 1406/2002 of the European Parliament and of the Council of 27 June 2002 establishing a European Maritime Safety Agency, as amended, in particular providing the core and ancillary tasks foreseen under Articles 2 and 3.
- (b) compliance with a legal obligation to which EMSA is subject x
- (c) necessary for the performance of a contract with the data subject or for the preparation of such a contract ☐
- (d) Data subject has given consent (*ex ante*, explicit, informed) ☐

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?	
EMSA staff	<input checked="" type="checkbox"/>
Non-EMSA staff (contractors staff, external experts, trainees)	<input checked="" type="checkbox"/>
Trainees and external experts may on occasion be asked to go on mission for EMSA. For practical reasons, EMSA may also organise the missions for representatives from third countries.	
Visitors to EMSA building	<input type="checkbox"/>
Relatives of the data subject	<input type="checkbox"/>
Other (please specify):	
6) Categories of personal data processed (Article 31.1(c))	
<i>Please tick all that apply and give details where appropriate</i>	
(a) General personal data:	
The personal data contains:	
Personal details (name, address etc)	<input checked="" type="checkbox"/>
Name of staff member, personal number, grade, unit, department.	
In the event of missions to high-risk destinations, the date of birth of the traveller will also be provided to the contractor.	
Education & Training details	<input type="checkbox"/>
Employment details	<input checked="" type="checkbox"/>
Name the employer and job title.	
Financial details	<input checked="" type="checkbox"/>
Bank account in case the staff member makes a claim.	
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details):	

(b) **Sensitive personal data** (Article 10)

The personal data reveals:

Racial or ethnic origin ☐

Political opinions ☐

Religious or philosophical beliefs ☐

Trade union membership ☐

Genetic, biometric or data concerning health ☐

Information regarding an individual's sex life or sexual orientation ☐

7) Recipient(s) of the data (Article 31.1 (d))

Recipients are all parties who have access to the personal data

Data subjects themselves x

Managers of data subjects ☐

Designated EMSA staff x

- Members of the Missions Team/Bureau of the Executive Director involved with the organisation of missions
- HR Officer/Senior HR Officer acting as project officer for the management of the insurance contract

Other (please specify):

- Staff of the external contractor responsible for providing the insurance coverage.
- Access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Civil Service Tribunal, the Internal Audit Service, the European Court of Auditors, OLAF, the European Public Prosecutor's Office and the European Data Protection Supervisor

8) Transfers to third countries or recipients outside the EEA (Article 31.1 (e))

If the personal data are transferred outside the European Economic Area, this needs to be specifically mentioned, since it increases the risks of the processing operation.

Data are transferred to third country recipients:

Yes ☐

No x

If yes, specify to which country:

If yes, specify under which safeguards:

Adequacy Decision of the European Commission ☐

Standard Contractual Clauses ☐

Binding Corporate Rules ☐

Memorandum of Understanding between public authorities ☐

9) Technical and organisational security measures (Article 31.1(g))

Please specify where the data are stored during and after the processing

How is the data stored?

EMSA network shared drive x

An excel file is kept on the H drive which is restricted for HR use only.

Outlook Folder(s) x

Hardcopy file ☐

Cloud (give details, e.g. public cloud) ☐

Servers of external provider

x

Other (please specify): ABAC and ARES for the payment of the invoice.

10) Retention time (Article 4(e))

How long will the data be retained and what is the justification for the retention period? Keep in mind that there are pre-determined retention periods for most types of files. Those are explained in the Records Management Policy and Procedure of the Agency. You can check EMSA Records Management Policy and Procedure [here](#).

7 years in line with the guidelines on Mission information management in EMSA's Records Management Policy and Procedures.