

TEMPLATE FOR RECORDING OF PROCESSING ACTIVITY

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

NAME OF PROCESSING ACTIVITY¹: Management of EMSA Events

1) Controller(s) ² of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA), Head of Unit 4.2. Legal, Finance & Facilities</p> <p>Organisational unit responsible³ for the processing activity Head of Unit 4.2. Legal, Finance & Facilities</p> <p>Contact person: Raquel Ferraria</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 <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: Head of Unit 4.2. Legal, Finance & Facilities</p> <hr/> <p>The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party [indicate third party] <input checked="" type="checkbox"/></p> <p>Grupo 8-Vigilância E Prevenção Electrónica, S.A</p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p>

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

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.

According to EMSA Regulation (EC) N° 1406/2002, among other core tasks, the Agency shall work with Members States to organise, where appropriate, relevant training activities in fields which are the responsibility of the Member State (Article 2, point 3(b)), to provide technical assistance to the Member States and to the Commission to contribute to the relevant work of technical bodies.

The organisation of workshops, pieces of training and other relevant events is part of EMSA's core business. Therefore, for logistic organisation and security purposes, it is necessary to collect experts or visitors' personal data.

Additionally, EMSA may receive the visit of students, national authorities and any other entity interested in the core business of EMSA. Those activities illustrate and give more visibility to the Agency and its achievements.

Furthermore, EMSA may host events from other organisations in its conference centre; therefore, the collection of personal data may be needed for security and logistic reasons.

Guests invited to attend EMSA events are requested to register online using an electronic form available on the EMSA extranet (Joomla tool). Via the form, guests provide necessary data relevant to the reimbursement process and security control (entrance to the building). For registration purposes, guests of EMSA events need to sign an attendance list upon arrival for every day of the event they are participating.

Visitors without needing online registration (single meetings with EMSA Project Officers, meetings hosted by EMSA, etc.) send the necessary data via the Events dedicated e-mail or directly to the staff member who informs the reception.

For virtual events, the meeting organiser (EMSA staff member) can record and download the video and the attendees' list from Teams or Zoom. The host shall announce that no recordings of any kind shall be made by the attendees and if participants do not wish their image/voice to be recorded, they shall turn-off their camera and mute their microphone.

Attendance list for signatures and personal badges are generated using relevant data. For professional reasons (network, reports, further professional connections), the attendance list with name, surname, e-mail address and organisation may be shared under request to the guests involved in a particular event.

If applicable, the travel and accommodation expenses incurred will be reimbursed to the guests after the event. The reimbursement file is composed of supporting documents listed in the EMSA Rules on Reimbursement of Expenses to Experts:

- documents proving the price of the travel for the flight (e.g. e-ticket, copy of the travel Agency invoice) or of any other mode of public transport such as train or bus (e.g. copy of the ticket)
- the legal entity and the bank account details.

The reimbursement file will be handled by an Administrative Assistant (Unit 4.0) and/or Events Assistants (Unit 4.2), verified by the relevant colleagues in the Legal and Financial Affairs Unit and subsequently signed off by the Authorising Officer of the relevant units, before to final processing by the Accountant. The Events team download the relevant information from Joomla (excel file) and from received e-mails. The attendance list with guests' signatures is included as supporting documents in ARES for the reimbursement files, which are executed via ARES and ABAC.

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) ☒
(EMSA Legal Funding Regulation (EC) No 1406/2002, Article 2, point 3.(a), 3.(b), 4.(e)., Article 2a point 3.(c))

Decision of EMSA Executive Director No 2007/19 Relating to the Reimbursement of Travel, Subsistence and Other Expenses to Experts and Candidates in Recruitment Procedures and amended by ED Decisions No. 2008/24, 2008/37, 2010/18, 2012/018, 2013/028, 2015/002 and 2018/36.

- (b) compliance with a legal obligation to which EMSA is subject ☐
(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) ☐

Describe how consent will be collected and where the relevant proof of consent will be stored

Data Subjects are informed about their rights via the following disclaimer available at all stages of the online registration and reimbursement claim process:

Personal data protection

The processing of personal data in the Community institutions and bodies like agencies is regulated by Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC. Read the rules related to personal data protection.

In addition, the relevant Privacy Statements are available via a link at the registration site and EMSA webpage.

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

Whose personal data are being processed?

EMSA staff



Non-EMSA staff (contractors staff, external experts, trainees)	<input checked="" type="checkbox"/>
Visitors to EMSA building	<input checked="" 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: first name, surname, city, country, e-mail, image (for virtual meetings only when recorded)	<input checked="" type="checkbox"/>
Education & Training details	<input type="checkbox"/>
Employment details: organisation, e-mail, position held, employer information (name, city, country, address, website, business or sector)	<input checked="" type="checkbox"/>
Financial details: bank account and account holder	<input checked="" type="checkbox"/>
Family, lifestyle and social circumstances	<input checked="" type="checkbox"/>
Travel and accommodation details for the reimbursement	
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	<input type="checkbox"/>

Political opinions	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Trade union membership	<input type="checkbox"/>
Genetic, biometric or data concerning health	<input type="checkbox"/>
Information regarding an individual's sex life or sexual orientation	<input type="checkbox"/>
7) Recipient(s) of the data (Article 31.1 (d))	
<i>Recipients are all parties who have access to the personal data</i>	
Data subjects themselves	<input checked="" type="checkbox"/>
- The attendance list may be shared upon request for the participants of the same meeting.	
Managers of data subjects	<input type="checkbox"/>
Designated EMSA staff members:	<input checked="" type="checkbox"/>
- the Project Officer responsible for the event or/and his/her team.	
-The relevant Administrative Officer (Unit 4.0) and/or Events Assistants (Unit 4.2).	
- the Legal and Finance staff handling the reimbursement of travel costs linked to the meeting, the allowances payment.	
- The Authorising Officer of the relevant units and the Accountant.	
- The Webmaster responsible for Joomla.	
- occasionally, specialised members of the ICT Unit involved in the management and development of the IT applications.	
Designated Contractors' staff members	<input checked="" type="checkbox"/>
- The Security Staff managing the reception and the distribution of the event badge for the guests	
Other (please specify):	

- also if appropriate, 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 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 ☒

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 (with restricted access to EMSA designated staff) ☒

Outlook Folder(s) (with restricted access to EMSA designated staff) ☒

Hardcopy file (archived and filed according to Document Management Rules) ☒

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

Servers of external provider ☐

Other (please specify): Joomla database (EMSA Server), ARES and ABAC.

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 at the Intranet of the Agency.

- Experts Reimbursement data (electronic) – 7 years.
- Joomla database – eliminated 1 year after the payment file is complete.
- Paper version for reimbursements – 7 years.
- Paper version for visitors: file eliminated after any business related to the meeting is closed, no more than 6 months after the event.
- For online meetings, the retention of data is described in the system related (Zoom or Teams) record of processing activity.