

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

NAME OF PROCESSING ACTIVITY:

Management of experts attending EMSA meetings, conferences and training courses (online registration and reimbursement of travel expenses)

1) Controller(s) of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA)</p> <p>Organisational unit responsible for the processing activity: 4.2 – Legal, Finance & Facilities</p> <p>Contact person: Andrea Iber</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))
<p>The data is processed by EMSA itself <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: 4.2 – Legal, Finance & Facilities</p>
<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 type="checkbox"/></p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p>
3) Purpose of the processing (Article 31.1(b))
<p><i>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.</i></p>
<p>The purpose(s) of the processing of personal data are:</p> <ul style="list-style-type: none"> - to manage a financial file for the reimbursement of travel expenses, accommodation and daily allowances to EMSA Experts and visitors; - to generate attendance lists and badges for safety, security and participation purposes. <p>Experts invited to attend EMSA meetings are requested to register online using an electronic form available at EMSA extranet (joomla tool). Through this form, experts provide the data required for the reimbursement process and security control (entrance to the building). For registration purposes, experts and visitors of EMSA events must sign an attendance list upon arrival each day of the meeting/event they are attending.</p> <p>Once the meeting is over, the reimbursement process begins in which the experts are reimbursed for their travelling expenses, accommodation and daily allowances.</p> <p>The reimbursement process is based on supporting documents (in accordance with EMSA's Rules for the Reimbursement of Experts) namely:</p>

- Document(s) providing the price, itinerary, dates and class for the flight (e.g., e-ticket, ticket receipt, travel agency invoice);
- Document(s) providing the price, itinerary and dates of any mode of public transport such as train, bus or metro used during your journey (e.g., copy of the ticket or ticket receipt).
- Document(s) related to car travel expenses (e.g., print screen from google maps showing the itinerary and receipts of motorway tolls, if any).

The mentioned documents are provided via online through the digital form and occasionally directly to the email: expert.reimbursements@emsa.europa.eu

For reimbursement purposes, if the expert's bank account is not registered in the EU institutions' system, the financial identification form is also requested by EMSA and provided by the expert.

The reimbursement file is handled by EMSA's Reimbursement team, verified by the relevant colleagues in the Finance Unit and subsequently signed and approved by the Authorising Officer of the meeting, prior to final processing by the Accountant.

Events procedure:

- Participants fill in the online registration form (name, country, e-mail, organisation, bank account number and account holder name);
- Joomla database saves the information provided (EMSA server);
- Events team download the registration information from joomla (excel file);
- Attendance list for signatures and personal badges are generated using registration data;
- Scanned attendance list is included as a supporting document in ARES expert payment file (for meetings with reimbursements);
- Expert payments are executed via ARES (documents circulation) and ABAC (budgetary execution).

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) ☒
(Examples of legal basis: e.g. Article 2 'Core tasks of the Agency', par.4 b) EMSA founding regulation)
- (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

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) ☒

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	<input checked="" type="checkbox"/>
Participant personal details: first name, surname, country, e-mail;	
Education & Training details	<input type="checkbox"/>
Employment details	<input checked="" type="checkbox"/>
Employer information (organisation name);	
Financial details	<input checked="" type="checkbox"/>
Bank account number and account holder name;	
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details): Documents related to experts travel expenses, namely: <ul style="list-style-type: none"> • Document(s) providing the price, itinerary, dates and class for the flight (e.g., e-ticket, ticket receipt, travel agency invoice); • Document(s) providing the price, itinerary and dates of any mode of public transport such as train, bus or metro used during your journey (e.g., copy of the ticket or ticket receipt). • Document(s) related to car travel expenses (e.g., print screen from google maps showing the itinerary and receipts of motorway tolls, if any). 	
(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 type="checkbox"/>
Managers of data subjects	<input type="checkbox"/>
Designated EMSA staff members	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • The relevant EMSA Events team; • The Finance unit handling the reimbursement file, the Authorising Officer who approves the payment and the accountant; • Occasionally, specialised members of the Communication unit who are in charged of EMSA extranet tools (e.g., joomla); 	
Designated Contractors' staff members	<input type="checkbox"/>
Other (please specify):	
<ul style="list-style-type: none"> • 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))	
<i>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.</i>	
Data are transferred to third country recipients:	
Yes	<input type="checkbox"/>
No	<input checked="" type="checkbox"/>
If yes, specify to which country:	
If yes, specify under which safeguards:	
Adequacy Decision of the European Commission	<input type="checkbox"/>
Standard Contractual Clauses	<input type="checkbox"/>
Binding Corporate Rules	<input type="checkbox"/>
Memorandum of Understanding between public authorities	<input type="checkbox"/>
9) Technical and organisational security measures (Article 31.1(g))	
<i>Please specify where the data are stored during and after the processing.</i>	
How is the data stored?	
EMSA network shared drive (with restricted access to EMSA designated staff)	<input checked="" type="checkbox"/>

Outlook Folder(s) (with restricted access to EMSA designated staff)	<input checked="" type="checkbox"/>
Hardcopy file (archived and filed according to Document Management Rules)	<input checked="" type="checkbox"/>
Cloud (give details, e.g., public cloud)	<input type="checkbox"/>
Servers of external provider	<input type="checkbox"/>
Other (please specify): Joomla database (EMSA Server), ARES and ABAC	
10) Retention time (Article 4(e)) <i>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.</i>	
EMSA.8.2.8.B Expert reimbursements – 7 years (including paper version documents such as: signed attendance lists). Joomla database information – 1 year.	