

Data Protection Statement/Privacy Statement on the processing of personal data in the context of the License management for Adobe Creative Cloud for EMSA activities

The protection of privacy is of high importance to the European Maritime Safety Agency ('EMSA'). EMSA is responsible for the personal data it processes. Therefore, we are committed to respecting and protecting the personal data of every individual and to ensuring efficient exercising of data subject's rights. All the data of personal nature, namely data that can identify an individual directly or indirectly, will be handled fairly and lawfully with the necessary due care.

This processing operation is subject to Regulation 2018/1725 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data. The information in this Privacy Statement is given pursuant to Articles 15 and 16 of the Regulation 2018/1725.

1. Nature and the purpose(s) of the processing operation

The purpose of this processing operation is to buy and manages licenses of Adobe Creative Cloud to enhance EMSA's digital capabilities. Adobe Creative Cloud offers a suite of tools that are essential for creating high-quality graphics, videos, and other multimedia content. This can support the quality of EMSA's communications and other digital outputs, like those manage by the colleagues of the Communications (Executive Office) and the Virtual lab (Unit 1.3 Capacity Building)

The licenses management and attribution are managed by the Service Desk from the Unit 3.3 Horizontal Digital Services. The EMSA license administrator uses the Adobe online platform to assign licenses to EMSA employees where necessary.

The names and e-mail addresses of EMSA Adobe Software users are being processed by Adobe to identify license usage. Every EMSA licensed Adobe user logs into the software with their e-mail address, that is being verified and monitored online for usage of each license.

Furthermore, EMSA documents, photos, and videos related to EMSA activities can be stored and edited on Adobe Cloud using Adobe Cloud Applications. Since Adobe Creative Cloud allows for file editing via their cloud storage, there is a possibility that some personal data could be stored in the cloud. These files are only accessible to authorised/licensed users.

EMSA will not reuse the personal data for another purpose that is different to the one stated above.

The processing is not intended to be used for any automated decision making, including profiling.

2. Categories/types of personal data processed

The categories/types of personal data processed are the following:

General personal data:

- Personal details: Name and Surname
- Employment details: e-mail address

3. Processing the personal data

The processing of the personal data is carried out under the responsibility of the Unit 3.3 Horizontal Digital Services, acting as delegated EMSA data controller.

Personal data are processed by relevant staff in the Unit 3.3 Horizontal Digital Services and Adobe Systems Software Ireland Limited.

4. Access to and disclosure of personal data

The personal data is disclosed to the following recipients:

- The Data subject themselves: Designated staff on the Executive Office, Virtual lab or any other EMSA Adobe Software users.
- Designated EMSA staff members: Staff from the Service Desk in charge of the licenses management.

The information in question will not be communicated to third parties, except where necessary for the purpose outlined above. Personal data are not intended to be transferred to third countries.

5. Protecting and safeguarding personal information

EMSA implements appropriate technical and organisational measures in order to safeguard and protect data subjects' personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to them.

The personal data related to the License management for Adobe Creative Cloud for EMSA activities are stored in secure IT applications according to the security standards of the Agency.

6. Access, rectification, erasure or restriction of processing of personal data

Data subjects have the right to access, rectify, erase, and receive their personal data, as well as to restrict and object to the processing of the data, in the cases foreseen by Articles 17 to 24 of the Regulation 2018/1725.

If data subjects would like to exercise any of these rights, they should send a written request explicitly specifying their query to the delegated data controller, Head of Unit Unit 3.3 Horizontal Digital Services.

The above requests will be answered without undue delay, and in any event within one month of receipt of the request. However, according to article 14 (3) of the Regulation 2018/1725, that period may be extended by two further months where necessary, taking into account the complexity and number of the requests. EMSA shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

7. Legal basis for Data processing

Processing of the personal data is based on Article 5 (a) of the Regulation 2018/1725.

8. Storing Personal data

EMSA does not keep personal data longer than necessary for the purpose(s) for which that personal data is collected.

The personal data related to the License management for Adobe Creative Cloud for EMSA activities is retained for the duration of the contract for the licensed software.

9. Data protection points of contact

Should data subjects have any queries/questions concerning the processing of your personal data, they should address them to the data controller, Unit 3.3 Horizontal Digital Services under the following mailbox: dpo-queries-dept3@emsa.europa.eu

Any data subject may also consult EMSA Data Protection Officer at: DPO@emsa.europa.eu.

Recourse:

Complaints, in cases where the conflict is not resolved by the Data Controller and/or the Data Protection Officer, can be addressed at any time to the European Data Protection Supervisor: edps@edps.europa.eu.

