

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

NAME OF PROCESSING ACTIVITY: EMSA Children's Competition 2025-2027

<b>1) Controller(s) of data processing operation (Article 31.1(a))</b>	
Controller: European Maritime Safety Agency (EMSA)	
Organisational unit <b>responsible</b> for the processing activity: Executive Office - Communication Unit	
Contact person: Ruth McDonald	
Data Protection Officer (DPO): <a href="mailto:dpo@emsa.europa.eu">dpo@emsa.europa.eu</a>	
<b>2) Who is actually conducting the processing? (Article 31.1(a))</b>	
The data is processed by EMSA itself	<input checked="" type="checkbox"/>
The organisational unit conducting the processing activity is: Executive Office - Communication Unit	
The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party:	
	<input checked="" type="checkbox"/>
European Commission: <a href="#">EUSurvey - Welcome</a>	
Contact point at external third party (e.g. Privacy/Data Protection Officer): <a href="mailto:DATA-PROTECTION-OFFICER@ec.europa.eu">DATA-PROTECTION-OFFICER@ec.europa.eu</a>	

<b>3) Purpose of the processing (Article 31.1(b))</b>
<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>
The purpose of the processing activity is to manage EMSA Children's Competition 2025-2027. The competition called "A sea of ideas" is an artwork initiative. It supports EMSA's Diversity and Inclusion Strategy by raising awareness about the Agency and the maritime and sustainability sector among school children through educational activities.
For this purpose, EMSA will launch three editions of the competition, expanding its geographical reach each year:

- **2025 edition:** the competition will target primary level (children between 6-10 years old) and intermediate level (children between 11-12 years old) schools based in Portugal only.
- **2026 edition:** while maintaining the Portuguese network from the previous edition, the competition will gradually include schools from other EU Member States.
- **2027 edition:** the competition will be fully EU-based to coincide with EMSA's 25th anniversary incorporating schools that participated in the 2025 and 2026 editions.

For the 2025 and 2026 competitions, Escola Azul, the Ministry of the Economy's educational programme, will be EMSA's partner. Escola Azul will be responsible for notifying schools within its national network and inviting them to participate. The competition will be coordinated by the Executive Office - Communication team.

The processing steps are as follows:

1. An extranet page will be set up to contain information about the competition - theme and categories, rules and data protection documents - <https://extranet.emsa.europa.eu/mar-de-ideias>
2. Schools will be invited to submit artwork by filling in an application form available on the competition page. The submission form will be created using the EU Survey. Once submitted, all school applications will be received in the dedicated email created for this competition: [mardeideias@emsa.europa.eu](mailto:mardeideias@emsa.europa.eu)

The form will require teachers to list their names and email contact, name and address of the school, school year, artwork title and description (as mandatory fields). The form also contains a tick box in which teachers consent the processing of their personal data.

3. Data from the form will be consolidated in an Excel table and stored on EMSA's secure servers – outlook folder and p: drive, with restricted access (for the project team only).
4. Once the winners are decided, the project team will contact the teachers of the relevant classes for the names of the children, to create certificates that they will receive at the ceremony.
5. Winning schools will be invited to the award ceremony at EMSA premises by email. In this invitation, a consent form will be provided to schools to collect the signatures of the children's guardians for the children's data processing, particularly regarding:
  - name and surname for printing award certificates;
  - image from photographs, video and voice recordings on the day of the ceremony for publication in the social media EMSA's channels (Instagram, Facebook) and on the competition webpage;
  - live broadcast of the awards ceremony via the competition webpage.

Photos of the artwork will be shared in EMSA's communication channels (extranet page, Instagram and Facebook). Photos and videos of the winning ceremony will also be shared in the same channels, in line with the consent given by the children's guardians.

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

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

Mention the legal basis which justifies the processing	
<p>(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)</p> <p>(Legal basis: Article 4(2) 'Transparency and protection of information', EMSA founding regulation)</p> <p>c</p>	<input checked="" type="checkbox"/>
<p>(b) compliance with a legal obligation to which EMSA is subject</p>	<input type="checkbox"/>
<p>(c) necessary for the performance of a contract with the data subject or for the preparation of such a contract</p>	<input type="checkbox"/>
<p>(d) Data subject has given consent (<i>ex ante</i>, explicit, informed)</p> <p>Additional legal basis: Article 8 <b>Conditions applicable to a child's consent in relation to information society services</b></p> <p>Where point (d) of Article 5(1) applies, in relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 13 years old. <i>Where the child is below the age of 13 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.</i></p>	<input checked="" type="checkbox"/>
5) Description of the categories of data subjects (Article 31.1(c)) <i>Whose personal data are being processed?</i>	
EMSA staff	<input type="checkbox"/>
Non-EMSA staff (contractors' staff, external experts, trainees): Children's guardians, teachers and children participating in the competition.	<input checked="" type="checkbox"/>
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>	
<p>(a) <b>General personal data:</b> The personal data contains:</p>	

Personal details: name and surname of teachers, children and children's guardians	<input checked="" type="checkbox"/>
Education & Training details: schools name, address and school year	<input checked="" type="checkbox"/>
Employment details	<input type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details): Image and voice of the teachers and children participating in the award ceremony.	
<b>(b) Sensitive personal data (Article 10)</b>	
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"/>
<b>7) Recipient(s) of the data (Article 31.1 (d))</b>	
<i>Recipients are all parties who have access to the personal data</i>	
Data subjects themselves:	<input checked="" type="checkbox"/>
Managers of data subjects	<input type="checkbox"/>
Designated EMSA staff members: Executive Office – Communication unit	<input checked="" type="checkbox"/>
Designated Contractors' staff members	<input type="checkbox"/>
Other (please specify): Photographs and recordings of the award ceremony will be shared on EMSA's social media channels, making them accessible to the general public.	
<b>8) Transfers to third countries or recipients outside the EEA (Article 31.1 (e))</b>	
<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))

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

How is the data stored?

- |   |                                     |
|---|-------------------------------------|
| EMSA network shared drive   | <input checked="" type="checkbox"/> |
| Outlook Folder(s)   | <input checked="" type="checkbox"/> |
| Hardcopy file   | <input type="checkbox"/>            |
| Cloud (give details, e.g. public cloud)   | <input type="checkbox"/>            |
| Servers of external provider  | <input type="checkbox"/>            |
| Other (please specify): EU Survey, Extranet page and EMSA Social Media Channels |                                     |

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.*

Photographs and recordings of the award ceremony, taken as part of a communication plan to promote EMSA policies and activities among internal or external groups, are retained for two years. After this period, they are archived separately for historical purposes. The names and surnames of teachers, children, and their guardians will be deleted one year after the award ceremony. Regarding publication on social media, the relevant Data Protection policies of the respective channels will apply. With regard to EU Survey, please consult their privacy notice: [EUSurvey - Privacy Statement](#)