

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

NAME OF PROCESSING ACTIVITY<sup>1</sup>: Preparation and publication of Human Resources & Internal Support Unit's newsletter.

<b>1) Controller(s)<sup>2</sup> of data processing operation (Article 31.1(a))</b>
<p>Controller: European Maritime Safety Agency (EMSA)</p> <p>Organisational unit <b>responsible</b><sup>3</sup> for the processing activity: Unit 4.1, Human Resources and Internal Support]</p> <p>Contact person: Cristina ROMAY LOPEZ</p> <p>Data Protection Officer (DPO): Radostina Nedeva-Maegerlein: <a href="mailto:dpo@emsa.europa.eu">dpo@emsa.europa.eu</a></p>
<b>2) Who is actually conducting the processing? (Article 31.1(a))<sup>4</sup></b>
<p>The data is processed by EMSA itself <span style="float: right;"><input checked="" type="checkbox"/></span></p> <p>The organisational unit conducting the processing activity is: Unit 4.1, Human Resources and Internal Support.</p> <hr style="border: 0.5px solid #ccc;"/> <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] <span style="float: right;"><input type="checkbox"/></span></p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p>

<sup>1</sup> **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.

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

<sup>3</sup> This is the unit that decides that the processing takes place and why.

<sup>4</sup> Is EMSA itself conducting the processing? Or has a provider been contracted?

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.*

Unit 4.1, Human Resources & Internal Support Unit, publish a newsletter that circulates internally through the EMSA Intranet.

The purpose of the internal newsletter is to improve internal communication, staff interaction and strengthen staff bonds within EMSA. To this end, the Editorial Team process personal data collected from the data subjects to prepare articles for the newsletter publication.

The personal data are generally submitted by the data subjects themselves when they participate in the newsletter production. They participate by writing an article, making a comment, giving an interview, providing or appearing in a photograph that might be related to their tasks and work at EMSA, hobbies, scientific knowledge, social issues, voluntary work, professional experiences, and similar related to the nature and goals of the newsletter mentioned above.

The Editorial Team of the newsletter collects/write the articles together with the data subjects. Other than the language and syntax proofreading, potential text changes are usually given a second authorisation by the data subjects before publication.

The Executive Director gives the final authorisation for publication. The newsletter is published on the EMSA Intranet.

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) ☒

The publication of the 4.1 Unit's Newsletter aims to improve internal communication, staff interaction and strengthen staff bonds within EMSA. Thus, increasing the agency's efficiency to perform its tasks.

Legal basis of processing:

[Regulation \(CE\) n° 1406/2002 Article 4 \(2\) & 4 \(4\)](#) of the European Parliament and of the Council establishing a European Maritime Safety Agency, as amended.

- (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) ☐

Data Subjects will be informed of their data rights and the way their data will be handled during the process via the related Privacy Statement.

5) Description of the categories of data subjects (Article 31.1(c)) <i>Whose personal data are being processed?</i>	
EMSA staff	<input checked="" type="checkbox"/>
Non-EMSA staff (contractors staff, seconded national experts, trainees)	<input checked="" type="checkbox"/>
Visitors to EMSA building	<input type="checkbox"/>
Relatives of the data subject	<input type="checkbox"/>
Other (please specify): Experts on specific topics that the editorial team of the newsletter might include an article about.	
6) Categories of personal data processed (Article 31.1(c)) <i>Please tick all that apply and give details where appropriate</i>	
(a) <b>General personal data:</b>	
The personal data contains:	
Personal details (name, address etc) Name and Surname, e-mail address, nationality, gender	<input checked="" type="checkbox"/>
Education & Training details Degrees, Studies background,	<input checked="" type="checkbox"/>
Employment details Job title, name of employers,	<input checked="" type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances Portrait and group photos	<input checked="" type="checkbox"/>
Goods or services provided	<input type="checkbox"/>

Other (please give details):

There is a possibility that the details of the categories of the data processed are more than the details provided above, as it depends on the published articles.

(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 ☒

Managers of data subjects ☒

Designated EMSA staff members ☒

- Newsletter Editorial Team is composed by designated staff in the Unit 4.1 and the Graphic Designer of the Executive Office.
- Webmaster

Designated Contractors' staff members ☐

Other (please specify): all EMSA staff that can access the newsletter through the EMSA intranet.

Personal data that is published in the newsletter can be accessed through the EMSA Intranet. EMSA intranet can be accessed by EMSA visitors with an authorised account connected to a laptop/desktop in the internal network, "working" accounts such as the ones used in the desktop in common rooms, plenary room, etc.

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 ☒

Outlook Folder(s) ☒

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): ARES and EMSA Intranet	
<p>10) Retention time (Article 4(e))</p> <p><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></p>	
Data will be kept for 10 years and then will be part of EMSA historical archives for permanent preservation (category EMSA 8.2.1)	