

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

NAME OF PROCESSING ACTIVITY¹: **Management of EMSA Who is Who**

1) Controller(s)² of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA)</p> <p>Organisational unit responsible³ for the processing activity: 4.1 Unit – Human Resources and Internal Support</p> <p>Contact person: Dounia Taghian - .1 Unit – Human Resources and Internal Support</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: 4.1 Unit – Human Resources and Internal Support</p>
<p>The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party. <input type="checkbox"/></p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p>

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?

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.

The purpose of this processing operation is to promote transparency and improve internal communication within EMSA. To achieve this, a "Who's Who" feature will be introduced on the intranet, organised by department and unit. This feature will display a staff member's name and unit, and by clicking on the name, additional information, such as their photo (if consented) and job description (JD), will be shown. The Who's Who will serve as an interactive, easily accessible directory for EMSA staff, facilitating better communication and understanding between departments and units.

To manage the use of staff photographs, voluntarily consent will be collected from employees. Staff members will be asked to complete a consent form, granting permission for their photograph to be displayed on the "Who's Who" section of the EMSA intranet. For those who provide consent, their photo will be taken by the communications team. However, employees who do not consent to having their photograph displayed will have a gender-neutral avatar created by the communications team in place of their photo.

All photographs and job descriptions will be securely stored in the HR Database, linked to each employee's personal number for easy reference. Updates to the photos or job descriptions will be managed within the HR DB by HR reviewing and refreshing the information monthly to ensure accuracy and timeliness.

Proof of consent will be stored in ARES. The job descriptions, which have already been completed for all employees by the HR department, will be prominently displayed in the Who's Who section alongside each staff member's full name and unit. The HR and communications teams have worked together to develop a dedicated section on the intranet, ensuring the information is displayed interactively and is easily accessible to all staff.

The employee's profile in the "Who's Who" feature will remain accessible as long as they are in active service at EMSA, ensuring that their details, including photos (if consented) and job descriptions, remain up to date. This initiative is designed to create a more transparent, communicative, and accessible organisational environment while fully respecting the preferences of staff members regarding the display of their photographs.

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 purpose is to enhance internal communication and make the display of job descriptions more interactive and accessible.

- (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

Consent for the use of photos will be voluntarily collected from staff. Each person will be asked for permission to have their photo displayed in the "Who is Who" section of the EMSA intranet. If the staff wishes to withdraw their consent, their photo will be promptly removed from the intranet.

Employees who do not provide consent will have a gender-neutral avatar created by the communication team instead of a photo.

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

Whose personal data are being processed?

EMSA staff



Officials, Temporary Agents and Contract Agents

Non-EMSA staff (contractors staff, external experts, trainees)



Seconded National Experts, Trainees, Interims, NEPTs, contractors staff

Visitors to EMSA building



Relatives of the data subject



Other (please specify):

6) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) **General personal data:**

The personal data contains:

Personal details (name, address etc)



Name and Surname

Education & Training details



Employment details	<input checked="" type="checkbox"/>
Department, Unit and Job Description	
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details): Photo	
 (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"/>
Managers of data subjects	<input type="checkbox"/>

Designated EMSA staff members <ul style="list-style-type: none"> Career Team in the 4.1 Unit IT and HR Administrators in charge of the HR database EMSA webmaster Communication Team in charge of the photo shooting Head of Unit 4.1 Unit Head of Department 4 	<input checked="" type="checkbox"/>
Designated Contractors' staff members	<input type="checkbox"/>
Other (please specify):	
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"/>

<p>9) Technical and organisational security measures (Article 31.1(g))</p> <p><i>Please specify where the data are stored during and after the processing</i></p>	
<p>How is the data stored?</p> <p>EMSA network shared drive <input checked="" type="checkbox"/></p> <p>Outlook Folder(s) <input checked="" type="checkbox"/></p> <p>Hardcopy file <input type="checkbox"/></p> <p>Cloud (give details, e.g. public cloud) <input type="checkbox"/></p> <p>Servers of external provider <input type="checkbox"/></p> <p>Other (please specify): It will be displayed on the EMSA Intranet and stored in the HR database.</p>	
<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>	
<p>The employee's profile will be displayed on the Who is Who on the intranet as long as the employee is in active service at EMSA.</p> <p>Once the employee is no longer with EMSA, their photo will be deleted from EMSA's stored systems.</p>	