

Data Protection Statement/Privacy Statement on the processing of personal data in the context of the Microsoft 365 Copilot - Pilot Project for Department 4 Services

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 (EU) No. 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 (EU) No. 2018/1725.

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

The purpose of the processing is to manage a pilot project to integrate artificial intelligence into the services provided by Department 4. The project aims to harness the transformative potential of AI to enhance corporate services, improve efficiency, accuracy, and decision-making processes, and ensure the organisation remains competitive and innovative.

The project is divided into three phases, each focusing on different AI use cases:

- Standard usage of Microsoft Copilot: This phase involves minimal configuration from IT and mainly requires purchasing licenses and assigning them to test users.
- Chatbots: This phase requires additional configuration from IT, external consultancy, and business input to train the chatbot.
- Custom developments: This phase involves more tailored AI solutions for specific needs

The project aims to test the following cases:

From 4.1 Unit – Human Resources and Internal Support:

- Improving Recruitment Experience (Phase 1)
- Improving Onboarding Experience (Phase 1)
- Improve drafting of document such as ED decisions, Administrative Notices, etc (Phase 1)
- HR/Support Services Chatbot (Phase 2)

From 4.2 Unit – Legal, Finance and Facilities

- Support on preparation of procurement and contract management documents (Phase 1)
- Automatic distribution of verification (legal and finance) tasks (Phase 1)
- Legal Chat bot (Phase 2)
- Contract management checks (Phase 3)

The pilot project entails the purchase of a number of Microsoft Copilot for 365 licenses to be distributed among a limited number of staff in the department 4 for testing the potential cases listed above.

The purpose of the processing is limited to testing the feasibility and the performance of integrating artificial intelligence, in this case with Microsoft 365 Copilot, into the services provided by Department 4.

Microsoft 365 Copilot is an assistant based on AI that supplements existing applications with additional functions. Copilot's functions are useful for the productivity and collaboration as well as any other M365 apps, e.g. Microsoft Word, Excel, PowerPoint, Teams, One Note, etc. The functions of Copilot include among others:

- Creation of text and wording suggestions in Word. Users can use a prompt to describe what content they want to create, analyse or summarise.
- Optimisation of tables in Excel. Users can analyse data entered in a table and have formulas created.
- Creation of visuals, text and wording suggestions in PowerPoint. Users can use a prompt to describe what content they want to create, analyse or summarise.
- Summarising chat communications in terms of key topics and transcribing phone calls and video conferences in teams and creating summary of these phone calls and video conferences. Copilot can include communication from the last 30 days in the summary of chat messages.

If the Controller decides to proceed with the integration, a record of processing activity will be created to each case.

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

2. Categories/types of personal data processed

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

- Personal details
- Education and Training
- Employment details
- Financial Details
- Family Details

3. Processing the personal data

The processing of the personal data is carried out under the responsibility of the Head of Department 4 Corporate Services, acting as delegated EMSA data controller.

Personal data are processed by designated staff of the Department 4 Corporate Services.

4. Access to and disclosure of personal data

The personal data is disclosed to the following recipients:

- The Department 4 staff having a Microsoft Copilot for 365
- Designated Contractors' staff members [Microsoft copilot](#)

The information concerning the Microsoft 365 Copilot - Pilot Project for Department 4 Services will only be shared with people necessary for the implementation of such measures *on a need to know* basis. The data are not used for any other purposes nor disclosed to any other recipient.

The information in question will not be communicated to third parties, except where necessary for the purpose(s) outlined above.

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.

All personal data related to EMSA staff participation in the Microsoft 365 Copilot - Pilot Project for Department 4 Services are stored in secure IT applications according to the security standards of the Agency as well as in specific electronic folders accessible only to the authorised recipients. Appropriate levels of *access are granted* individually only to the above recipients.

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 (EU) No. 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, the Head of Department 4 Corporate Services.

The right of rectification can only apply to inaccurate or incomplete factual data processed within the "EMSA staff participation in the **Microsoft 365 Copilot - Pilot Project for Department 4 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 (EU) No. 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 is based on Article 5 (a) of the Regulation (EU) No. 2018/1725.

Data Subjects of the "**Microsoft 365 Copilot - Pilot Project for Department 4 Services**" are informed of their data rights and the way their data will be handled during the process via this Privacy Statement.

8. Storing Personal data

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

Data will be 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, Head of Department 4 Corporate Services under the following mailbox: hr.info@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.

