

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

NAME OF PROCESSING ACTIVITY¹: Management of the VéloMai cycling campaign at EMSA

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: 4.0 – Department 4</p> <p>Contact person: Dominika Lempicka-Fichter</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: Dep. 4.0 and Unit 4.2 – Legal, Finance and Facilities</p> <hr/> <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] <input checked="" type="checkbox"/></p> <p>The European Commission HR.D.1 – for the use of the VeloMai app which Privacy Statement can be found here: Velomai (europa.eu)</p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p> <p>DATAPROTECTIONOFFICER@ec.europa.eu</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?

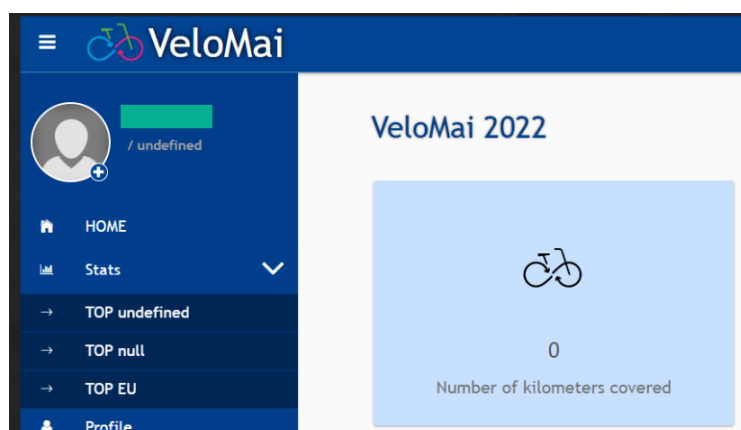
3) Purpose of the processing (Article 31.1(b))

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.

In line with the objectives of EMSA's Greening project, Environmental Statement and Programme, EMSA joined the Commission's VéloMai interinstitutional cycling campaign, which aims to motivate people to cycle to work, thus developing the habit of cycling regularly.

EMSA staff interested to participate are invited to register using their ECAS account by downloading the app VeloMai to their mobile phone or laptop. The app belongs to the European Commission and is used across all institutions participating in the cycling campaign, which Privacy Statement can be found here: [Velomai \(europa.eu\)](https://velomai.europa.eu).

Staff are invited to inform the Greening Team (via dedicated email address) that they registered, for planning purposes only. No individual tracking will be done. By the end of the month, for the attribution of the prizes, staff is invited to send (to the dedicated email address) a screenshot of the app with the total kms / number of rides visible, as in this below example:



The Greening Team (Dep 4.0 and Unit 4.1) will then process the data - Name of staff member and participation data (kms made on bicycle and number of times cycled) - in order to be able to award EMSA trophies. The winners of 5 categories (Best Female Km, Best Female N of rides, Best Male Km, Best Male N of rides and Best Group) will receive an EMSA Velomai trophy. With experience gained some additional categories may be established in years to come based on the data collected in future years.

EMSA will advertise this campaign in social media, intranet and internet as well as EMSA newsletter, including pictures sent by staff during their cycling tours.

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) ☒
- (Examples of legal basis: e.g. Article 2 'Core tasks of the Agency', par.4 b) EMSA founding regulation)

- Greening EMSA: VéloMai 2022 – ARES ref [emsa.4.adm\(2022\)3357359](#)

<ul style="list-style-type: none"> Adoption of Environmental Management System – ARES ref emsa.4.adm(2020)8404562 Updated version of Environmental Statement, Manual and associated documents following 2nd stage of EMAS Verification audit – ARES ref emsa.4.adm(2022)452575 	
(b)	compliance with a legal obligation to which EMSA is subject <input type="checkbox"/>
(c)	necessary for the performance of a contract with the data subject or for the preparation of such a contract <input type="checkbox"/>
(d)	Data subject has given consent (<i>ex ante</i> , explicit, informed) <input type="checkbox"/>
Describe how consent will be collected and where the relevant proof of consent will be stored	
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, external experts, trainees)	
Only those whit ECAS accounts can participate <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>	
(a) General personal data:	
The personal data contains:	
Personal details (name): Name only <input checked="" type="checkbox"/>	
Education & Training details <input type="checkbox"/>	
Employment details <input type="checkbox"/>	
Financial details <input type="checkbox"/>	
Family, lifestyle and social circumstances: kms made on bicycle and number of times cycled during May <input checked="" type="checkbox"/>	
Goods or services provided <input type="checkbox"/>	
Other (please give details): Photos of staff - EMSA will advertise this campaign in social media, intranet and internet as well as EMSA newsletter, including the pictures sent by staff during their cycling tours	
(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	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> - Head of Department 4 - Designated colleagues from 4.0 and 4.2 Unit in charge of the Greening project - Webmaster - Designated colleagues from Communication Unit in charge of EMSA's social media - All staff as photos will be published in the Intranet and/or EMSA's social media 	
Designated Contractors' staff members	<input type="checkbox"/>
Other (please specify): Photos will be used to make EMSA social media communication: will be available to the general public.	<input checked="" type="checkbox"/>
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"/>
9) Technical and organisational security measures (Article 31.1(g))	
<i>Please specify where the data are stored during and after the processing</i>	
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): Intranet, EMSA social media accounts	
<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>Category EMSA.6.2 of the EMSA retention list sets that the administrative retention period for files related to actions based on a communication plan to promote EMSA policies and activities among internal or external groups is 2 years. After that period, the files are transferred to the EMSA historical archives. With regard to the publication on social media, the relevant Data protection policies of the channels will apply. For the retention period of the data for the use of the VeloMai app, the Privacy Statement can be found here: Velomai (europa.eu)</p>	