

RECORDING OF PROCESSING ACTIVITY

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

NAME OF PROCESSING ACTIVITY¹: Processing of Personal Data for the Documentation of the EMSA Staff Teambuilding Days

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| 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: Executive Office</p> <p>Contact person: Data Controller, Head of EO – CommsDP@emsa.europa.eu</p> <p>Data Protection Officer (DPO): 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: Executive Office</p> |
| <p>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"/></p> <p>In the case of publication on social media, personal data are processed by a limited number of members of EMSA's communication team and by the platforms used for publication.</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?

The privacy statements of the social media accounts used by EMSA can be found through the following links:

Instagram & Facebook: [Meta Privacy Policy](#)

LinkedIn: [LinkedIn Privacy Policy](#)

X: [X Privacy Policy \(twitter.com\)](#)

YouTube: [Privacy Policy – Privacy & Terms - Google](#)

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 personal data, specifically video footage and photos of staff, are being processed to document and support the team building activities organised by the Agency. The rationale behind the processing is to enhance team spirit and cohesion by capturing moments of collaboration, engagement and interaction during the event.

The purpose of processing this data is threefold: to foster team spirit – by documenting the event, the Agency aims to emphasize and reflect the importance of teamwork, collaboration and interpersonal relationships among staff; create memories – the visual materials serve as a reminder of the shared experiences during the teambuilding day, reinforcing the bonds formed between colleagues; internal communication – these visuals may be used to highlight and recognise the active participation of staff, promoting a sense of belonging and inclusion'

The steps associated with the processing of the data include: collection – photos and video footage will be taken during the various activities throughout the event to document staff participation and teambuilding moments; storage – the captured media will be securely stored preventing unauthorised access; selection and editing – after the event, the visuals may be reviewed and edited for internal and external use, ensuring that only appropriate and relevant content is kept; usage – the selected media may be shared internally with staff to commemorate the event and reinforce the positive teambuilding experience, as well as externally (to a limited extent) to contribute to promote the corporate image and attractiveness of the Agency as a workplace.

The processing of this data aligns with the Agency's goals of fostering a collaborative work environment and strengthening team cohesion while respecting data protection obligations.

Participants of the teambuilding will be informed about their rights via a privacy statement published on the intranet before the event. If participants do not agree with their image being recorded and published, they are asked to opt out by contacting the organisers and or the EMSA staff taking pictures or filming at the event.

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

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| (including management and functioning of the institution) | <input checked="" type="checkbox"/> |
| (Examples of legal basis: e.g. Article 2 'Core tasks of the Agency', par.4 b) EMSA founding regulation) | |
| <ul style="list-style-type: none"> • EMSA Communication Strategy 2021-2024 • EMSA Internal Communication Strategy 2023-2026 | |
| (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 checked="" type="checkbox"/> |
| <p>Video footage and photos of staff members, published internally (on EMSA's intranet) and externally (on EMSA's social media channels), are processed based on the staff members' explicit consent, given through their voluntary participation in the teambuilding event. Staff members are informed of the recording and publication of such media, and their participation constitutes acknowledgment of these conditions. If participants do not agree with their image being recorded and published, they are asked to opt out by contacting the organisers and or the EMSA staff taking pictures or filming at the occasion.</p> | |
| 5) Description of the categories of data subjects (Article 31.1(c)) <i>Whose personal data are being processed?</i> | |
| EMSA staff Officials, Temporary Agents and Contract Agents | <input checked="" type="checkbox"/> |
| Non-EMSA staff (contractors staff, external experts, trainees) Seconded National Experts, Trainees, Interims, NEPTs, contractors staff | <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, address etc)

☐

Education & Training details

☐

Employment details

☐

Financial details

☐

Family, lifestyle and social circumstances

☐

Goods or services provided

☐

Other (please give details): Image

☒

(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

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| Data subjects themselves | <input checked="" type="checkbox"/> |
| Managers of data subjects | <input type="checkbox"/> |
| Designated EMSA staff members | <input checked="" type="checkbox"/> |
| Limited number of members of EMSA's communication team | |
| Designated Contractors' staff members | <input type="checkbox"/> |
| Other (please specify): General public accessing social media accounts | <input checked="" type="checkbox"/> |

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:

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| Yes | <input type="checkbox"/> |
| No | <input checked="" type="checkbox"/> |

If yes, specify to which country:

If yes, specify under which safeguards:

- | | |
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| Adequacy Decision of the European Commission | <input type="checkbox"/> |
| Standard Contractual Clauses | <input type="checkbox"/> |

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| 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> | |
| <p>How is the data stored?</p> <p>EMSA network shared drive <input checked="" type="checkbox"/></p> <p>Outlook Folder(s) <input 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):</p> | |
| 10) Retention time (Article 4(e)) <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>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.</p> <p>Retention of personal data in social media platforms can be consulted on the respective data policies (links Indicated).</p> | |