

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

NAME OF PROCESSING ACTIVITY<sup>1</sup>: **Trainee Induction Programme**

<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: 4.1 Unit – Human Resources and Internal Support</p> <p>Contact person: Cristina Romay Lopez - 4.1 Unit – Human Resources and Internal Support</p> <p>Data Protection Officer (DPO): <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 <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: 4.1 Unit – Human Resources</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>
<b>3) Purpose of the processing (Article 31.1(b))</b>
<p><i>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.</i></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?

The purpose of processing the personal data is to organise and facilitate visits as part of EMSA's Trainees Induction Programme. Within this programme, trainees participate in onboarding meetings with all EMSA units, as well as in internal and external visits.

- Internal visits may include EMSA's MSS or the eLab.
- External visits, organised annually, include organisations such as STRIKFORNATO (NATO base in Carcavelos), the European Drugs Agency (EUDA), the EU Permanent Representation in Portugal, the oil spill response vessels contracted by EMSA and the Maritime Analysis and Operations Centre Narcotics .

In order to arrange these external visits, EMSA is often required to contact the third-party host to schedule a date. Prior to the visit, these third parties may request specific personal data (such as names, email addresses, or identification details) to enable entry and properly organise the group's arrival.

Therefore, the processing of personal data is strictly necessary to meet the security and organisational requirements of the visited organisations and to ensure the smooth implementation of the Induction Programme.

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) ☒  
Article 5(2) of the Decision No. 2024/021 of the Executive Director relating to the Rules Governing the Traineeship Scheme of EMSA [Ares\(2024\)5230100](#)

(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

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

*Whose personal data are being processed?*

EMSA staff	<input checked="" type="checkbox"/>
Designated staff accompanying the trainees to external/internal visits as part of the induction programme	
Non-EMSA staff (contractors staff, external experts, trainees)	<input checked="" type="checkbox"/>
Trainees participating of the induction programme	
Designated interim accompanying the trainees to external/internal visits as part of the induction programme	
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) <b>General personal data:</b>	
The personal data contains:	
Personal details (name, address etc)	<input checked="" type="checkbox"/>
Surname, first name	
Copy of the ID card or Passport	
Education & Training details	<input type="checkbox"/>
Employment details	<input checked="" type="checkbox"/>
e-mail address	
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details):	

(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))

*Recipients are all parties who have access to the personal data*

- |  |                                     |
|--|-------------------------------------|
| Data subjects themselves                                       | <input checked="" type="checkbox"/> |
| Managers of data subjects                                      | <input type="checkbox"/>            |
| Designated EMSA staff members                                  | <input checked="" type="checkbox"/> |
| EMSA staff members organising the external and internal visits |                                     |
| Contractors Staff  | <input type="checkbox"/>            |

Other (please specify): Staff from third parties managing/receiving the trainees visit.

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 ☐

Cloud (give details, e.g. public cloud) ☐

Servers of external provider ☐

Other (please specify):

10) Retention time (Article 4(e))

*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.*

EMSA will retain the personal data only for the time strictly necessary to organise and facilitate the visit. Once the visit has been completed, and no further follow-up actions are required, the personal data will be deleted without undue delay.

With regard to personal data that may be transmitted to third parties, those entities will apply their own retention periods, in accordance with their internal policies and legal obligations.