

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

NAME OF PROCESSING ACTIVITY<sup>1</sup>:

**Adhering to the Secure European Centralized Address Books & Certificates (SECABC)**

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| <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<sup>3</sup></b> for the processing activity: 3.3 Horizontal Digital Services</p> <p>Contact person: Ivo KUPSKY – Head of Unit 3.3 - Horizontal Digital Services</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>Joint controllers for this processing activity. Roles and responsibilities of joint controllers are defined in the joint controllership agreement.</p> <p>The data is processed by EMSA itself <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: Unit 3.3</p> <hr/> <p>The data is processed by a third party (contractor) or <u>the processing operation is conducted together with an external third party - DIGIT B3</u> <input checked="" type="checkbox"/></p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer): <a href="mailto:EU-SECABC@ec.europa.eu">EU-SECABC@ec.europa.eu</a></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?

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.*

EMSA is participating voluntarily to the SECABC service. The SECABC platform provides the means to exchange securely between partner EUIBAs Microsoft Exchange Address Book information, S/MIME certificates for secure email exchanges and information for M365 tenants.

DIGIT uses the information exchanged through SECABC as a trustworthy datasource for the creation of user accounts in the EU COM's Microsoft 365 tenant.

Participation of EMSA is needed to make continued use of the EU COM's intranet (MyIntracomm) and to enable EMSA staff to access the published guidelines about legal, procurement and HR related matters thereon.

The processing of the data is co-controlled with DIGIT B3 in the scope of collecting and merging the data and making available of a contact list and their linked S/MIME certificates for EUIBAs who participate in the platform.

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 2 'Core tasks of the Agency', par.4 b) EMSA founding regulation
- (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 ☒

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

|   |                                     |
|---|-------------------------------------|
| Visitors to EMSA building   | <input type="checkbox"/>            |
| Relatives of the data subject   | <input type="checkbox"/>            |
| Other (please specify):   |                                     |
| <b>6) Categories of personal data processed (Article 31.1(c))</b><br><i>Please tick all that apply and give details where appropriate</i> |                                     |
| <b>(a) General personal data:</b><br>The personal data contains:  |                                     |
| Personal details (name, e-mail address, professional phone number, office location)   | <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  | <input type="checkbox"/>            |
| Goods or services provided  | <input type="checkbox"/>            |
| Other (please give details):  |                                     |
| <b>(b) Sensitive personal data (Article 10)</b><br>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

☐

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*

Data subjects themselves

☒

Managers of data subjects

☐

Designated EMSA staff members

☒

Designated Contractors' staff members

☐

Other (please specify): Potentially all EUIBAs that participate in the SECABC service -and- subscribe to receive contact details from other EUIBA through the SECABC service have access to the personal data provided by EMSA to the SECABC platform.

**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   | <input type="checkbox"/> |
| Standard Contractual Clauses   | <input type="checkbox"/> |
| Binding Corporate Rules  | <input type="checkbox"/> |
| Memorandum of Understanding between public authorities   | <input type="checkbox"/> |
| <b>9) Technical and organisational security measures (Article 31.1(g))</b><br><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 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):<br/> For the purposes of developing, managing and maintaining SECABC, the EC hosts data in its Data Centre operated by DG DIGIT.<br/> EMSA servers and also other EUIBAs serves participating of the SECABC platform.</p> |                          |
| <b>10) Retention time (Article 4(e))</b><br><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>  |                          |
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