

## **Data Protection Statement/Privacy Statement on the processing of personal data in the context of the Management of EMSA Who is Who**

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 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 2018/1725.

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

The purpose of this processing operation is to promote transparency and improve internal communication within EMSA. To achieve this, a "Who's Who" feature will be introduced on the intranet, organised by department and unit. This feature will display a staff member's name and unit, and by clicking on the name, additional information, such as their photo (if consented) and job description (JD), will be shown. The Who's Who will serve as an interactive, easily accessible directory for EMSA staff, facilitating better communication and understanding between departments and units.

To manage the use of staff photographs, voluntarily consent will be collected from employees. Staff members will be asked to complete a consent form, granting permission for their photograph to be displayed on the "Who's Who" section of the EMSA intranet. For those who provide consent, their photo will be taken by the communications team. However, employees who do not consent to having their photograph displayed will have a gender-neutral avatar created by the communications team in place of their photo.

All photographs and job descriptions will be securely stored in the HR Database, linked to each employee's personal number for easy reference. Updates to the photos or job descriptions will be managed within the HR DB by HR reviewing and refreshing the information monthly to ensure accuracy and timeliness.

Proof of consent will be stored in ARES. The job descriptions, which have already been completed for all employees by the HR department, will be prominently displayed in the Who's Who section alongside each staff member's full name and unit. The HR and communications teams have worked together to develop a dedicated section on the intranet, ensuring the information is displayed interactively and is easily accessible to all staff.

The employee's profile in the "Who's Who" feature will remain accessible as long as they are in active service at EMSA, ensuring that their details, including photos (if consented) and job descriptions, remain up to date. This initiative is designed to create a more transparent, communicative, and accessible organisational environment while fully respecting the preferences of staff members regarding the display of their photographs.

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

The processing is not intended to be used for any automated decision making, including profiling.

## **2. Categories/types of personal data processed**

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

### **General personal data:**

- Personal details: Name and Surname
- Employment details: Department, Unit and Job Description
- Other: Photo

## **3. Processing the personal data**

The processing of the personal data is carried out under the responsibility of the Head of Unit 4.1 Human Resources and Internal Support, acting as delegated EMSA data controller.

Personal data are processed by relevant staff in the Unit 4.1 Human Resources and Internal Support and Communication Team.

## **4. Access to and disclosure of personal data**

The personal data is disclosed to the following recipients:

- The Data subject themselves: Officials, Temporary Agents, Contract Agents, SNEs, NEPTs, Trainees, Interims and external contractors from ICT Helpdesk.
- Designated EMSA staff members: Career Team in the 4.1 Unit, IT and HR Administrators in charge of the HR database, EMSA webmaster, Communication Team in charge of the photo shooting, Head of Unit 4.1 Unit and Head of Department 4.

The information in question will not be communicated to third parties, except where necessary for the purpose outlined above. Personal data are not intended to be transferred to third countries.

## **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.

The personal data related to the Management of the Who is Who are stored in secure IT applications according to the security standards of the Agency.

## **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 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, Head of Unit Unit 4.1, Human Resources and Internal Support.

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 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 of the personal data is based on Article 5 (a) of the Regulation 2018/1725 except for the photo which is based on Article 5 (d) of the Regulation 2018/1725, which is consent.

Consent for the use of photos will be voluntarily collected from staff. Each person will be asked for permission to have their photo displayed in the "Who is Who" section of the EMSA intranet. If the staff wishes to withdraw their consent, their photo will be promptly removed from the intranet.

## **8. Storing Personal data**

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

The employee's profile will be displayed on the Who is Who on the intranet as long as the employee is in active service at EMSA.

Once the employee is no longer with EMSA, their photo will be deleted from EMSA's stored systems.

## **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 Unit 4.1, Human Resources and Internal Support under the following mailbox: [hr.career@emsa.europa.eu](mailto:hr.career@emsa.europa.eu)

Any data subject may also consult EMSA Data Protection Officer at: [DPO@emsa.europa.eu](mailto: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](mailto:edps@edps.europa.eu).