

Data Protection Statement/Privacy Statement on the processing of personal data in the procedure/context of Management of the corporate external communication activities

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 processing of personal data by the European Maritime Safety Agency (EMSA) for external communication purposes is driven by the overarching goal of disseminating information about its activities, projects, and actions, thus contributing to the realisation of the strategic goals outlined in EMSA's five-year strategy. This purpose aligns with the provisions set out in the Agency's Founding Regulation (EC) No 1406/2002.

The following communication activities at EMSA involve the processing of personal data:

a) Management of requests for information

Being subject to Regulation (EC) No 1367/2006 of the European Parliament and of the Council of 6 September 2006 on the application of the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters to Community institutions and bodies, EMSA is responsible for giving public access to the information it receives or produces, providing support and clarifications to individuals, commercial entities or other stakeholders that may reach the Agency to request such assistance. EMSA has established an official channel for requesters to submit their enquiries to. This consists of a form located in a dedicated page of EMSA's website – accessible through the following link: [Contact Form - EMSA - European Maritime Safety Agency \(europa.eu\)](https://europa.eu/ema/contact-form) – where requesters fill in the query they wish to have answered by the Agency, as well as the necessary personal information for EMSA to be able to reply, and a dedicated inbox to treat and organize these enquiries. However, queries may reach this inbox through other channels.

The steps involved in this process are as following: EMSA receives an enquiry in the information inbox, generally via the dedicated form which automatically forwards the request. This inbox is managed by a limited number of people from the Communications Team (a maximum of two people at any given time), who analyse the message, request more information or clarifications if needed, and then send the message to an appropriate expert or limited number of experts for response. The experts either provide a drafted response or

the information needed to do so, which is proofread by the managers of the information inbox and sent in the form of an official answer to the initial requester. Upon receipt of the response, the requester can ask for clarifications or further information, in which case the process is repeated.

b) Subscription to newsletters

EMSA manages an external newsletter which is sent to subscribers monthly. EMSA also manages a subscriber base for press release publication notifications and notifications of published calls for tender. All three consist of email notifications to an opt-in subscriber base with links to the product requested. Potential subscribers can request to receive these communications through a dedicated page on EMSA's website: <https://emsa.europa.eu/newsroom/subscriptions/user/modify.html> which includes a clearly marked consent option and links to the relevant data protection statement: *Data Protection Statement/Privacy Statement on the processing of personal data in the context of EMSA Subscriptions & Automatic Notifications*. Recipients have the option of opting out of receiving these emails at any stage.

c) The publication of photos and videos on EMSA's communication channels: the EMSA website

EMSA communicates on its own initiative in the fields within its mission, not only to ensure public access to reliable information, but also to develop the Agency's image and presence among the general public. This includes the publication of multimedia content on EMSA's website, regarding activities, events, services, and projects carried out within EMSA's scope, as well as respective copyrighted material when applicable, which may incorporate personal data.

The capture and storage of photos and videos at EMSA is described in the *Data Protection Privacy Statement on the processing of personal data in the procedure/context of filming at EMSA premises, special events and trainings* available here <https://emsa.europa.eu/about/personal-data-protection.html>.

To carry on the process of posting on social media platforms, specific members of EMSA's Communication team are in charge of capturing audio-visual content during the Agency's events and activities. The content is then edited and used across the platforms mentioned above. The material taken is securely stored in a restricted area on EMSA's server, accessible only to the Communication team and its Head of Unit. Similarly, any edited versions of this material are also stored in the same restricted area.

Once the editing process is complete, photos and video material displayed on EMSA's website are first loaded on to a secure server by an EMSA web publication specialist. The servers are protected by the following data policy: <https://emsa.europa.eu/disclaimer.html>

d) The publication of photos and videos on EMSA's communication channels: social media channels

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Once the editing process is complete, photos and videos are uploaded on to EMSA's social media channels by a member of the communication team.

The processing of personal data by EMSA is driven by the strategic necessity for transparent and effective corporate communication. The steps undertaken ensure compliance with data protection principles, informed consent, and alignment with the Agency's overarching goals and regulatory obligations.

The processing activities are not intended for use in any automated decision-making processes, including profiling.

2. Categories/types of personal data processed

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

1. INFORMATION INBOX
 - Title
 - Name
 - Employment details
 - Company/organisation
 - Field of activity

Requesters may provide other types of personal data in their message in order to request their intended information.

2. PUBLICATION ON SOCIAL MEDIA
 - Personal image
 - Name
 - Employment details
 - Link to user profiles (when relevant)
 - Nationality (when relevant)

3. Processing the personal data

The processing of the personal data is carried out under the responsibility of the Head of the Executive Office, acting as delegated EMSA data controller.

Personal data are processed by a limited number of members of EMSA's communication's team and a limited number of experts within EMSA.

In the case of publication on social media, personal data are processed by a limited number of members of EMSA's communication's team and by the platforms used for publication.

Social media platforms used are separate controllers for the personal data they process. Their privacy policies 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](#)

4. Access to and disclosure of personal data

The personal data which has been cleared for publication is disclosed to the following recipients:

- Data subjects themselves: individuals or other stakeholders that may access to information
- Designated EMSA staff members: Communication team members in the Executive Office which manage requests for information and experts from the different units in EMSA.

- Designated EMSA staff members: Communication team members in the Executive Office which collect, edit and publish social media content.
- General public accessing social media accounts and EMSA website.

Information concerning the management of the corporate external communication activities will only be shared with people necessary for the implementation of such measures *on a need to know* basis. The data are not used for any other purposes nor disclosed to any other recipient.

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.

All personal data related to the management of the corporate external communication activities are stored in secure IT applications according to the security standards of the Agency as well as in specific electronic folders accessible only to the authorised recipients. Appropriate levels of *access are granted* individually only to the above recipients.

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 the Executive Office.

The right of rectification can only apply to inaccurate or incomplete factual data processed within the 1: Management of the corporate external communication activities procedure.

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 is based on Article 4(a) of the Regulation 2018/1725 and Article 4(b) of the Regulation 2018/1725.

The personal data are collected and processed in accordance with the EMSA Communication Strategy 2021-2024 (Annex 1).

8. Storing Personal data

The retention of personal data within EMSA is carefully managed with varying retention periods, depending on the nature of the data processed.

Regarding the information inbox, personal data is retained for a period of two years. Retention of personal data in social media platforms can be consulted on the respective data policies (links indicated in section 3).

For data on the website and extranet, personal data is systematically deleted a maximum of five years from the conclusion of the relevant activity.

Photographic and videographic material may be retained indefinitely after the conclusion of the relevant activity for additional purposes linked with corporate communication, including archiving in the public interest as well as for scientific or historical research.

Social media accounts, each governed by their respective privacy policies, follow their own specific retention periods.

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 the Executive Office under the following mailbox: CommsDP@emsa.europa.eu.

Any data subject may also consult EMSA Data Protection Officer at: 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.