

## Data Protection Privacy Statement on the processing of personal data in the context of Management of EMSA Business cards – electronic versions

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 (EU) 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 (EU) 2018/1725.

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

The purpose of this processing operation is to provide electronic business cards for EMSA staff. This action replaces the previous printed business cards which were issued periodically for EMSA staff members to comply with the objectives of [EMSA's Environmental Statement](#) (Page 59: *Implementing sustainable practices and digital alternatives to reduce production of business cards in EMSA*).

The provider chosen for this task is Bitly Europe (privacy policy: [https://www.gr-code-generator.com/company/privacy-policy/?utm\\_source=header](https://www.gr-code-generator.com/company/privacy-policy/?utm_source=header)). This provider is based in Germany.

The following steps are used for the processing:

1. For the initial transition from paper business cards to electronic business cards, the communication team at EMSA will create an online form and publish it on the EMSA intranet together with a news item explaining the transition to digital. The online form contains the following **obligatory fields** for staff members to fill in:
  - a. First name
  - b. Surname
  - c. Job title
  - d. Email
2. Staff members may add their office phone number and their EMSA-issued mobile phone number if appropriate **as an option**. The only obligatory fields are the ones listed above.
3. The data entered into the form will be saved in the back-office system of the intranet, to which only a limited number of EMSA communication team members have access.
4. Using the [Bitly Europe tool](#), the communication team will then generate a QR code for each staff member.
5. The QR codes will then be distributed via the EMSA intranet; EMSA staff members will be able to access them from a designated page within the intranet ecosystem.
6. Staff members will be able to download the codes from the intranet and store them on their mobile phones.

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

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

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

General personal data:

- Personal details: First Name and Surname.

- Employment details: Job title, e-mail, work phone, and mobile phone (only for staff with EMSA mobile phones)

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

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

Personal data are processed by designated staff in the Communications Team of the Executive Office.

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

The personal data is disclosed to the following recipients:

- Data subjects themselves.
- Designated EMSA staff members: Communications Team of the Executive Office.
- Designated Contractors' staff members: [Privacy Policy - Bitly](#)

The information concerning this competition 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.

### **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 Management of EMSA Business cards – electronic versions is 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 (EU) 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 Executive Office, acting as delegated EMSA data controller.

The right of rectification can only apply to inaccurate or incomplete factual data processed within the **Management of EMSA Business cards – electronic versions**.

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 (EU) 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 5(a) Regulation (EU) 2018/1725.

## **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 personal data will be kept as long as the employee is in active service at EMSA.

## **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, Andrea Tassoni, Head of Executive Office, under the following mailbox: [commsdp@emsa.europa.eu](mailto:commsdp@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).