

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

NAME OF PROCESSING ACTIVITY¹: Travel risk management services

1) Controller(s)² of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA)</p> <p>Organisational unit responsible³ for the processing activity: Unit A.1 Human Resources and Internal Support</p> <p>Contact person: Cristina Romay Lopez, Head of Unit 4.1 Human Resources and Internal Support</p> <p>Data Protection Officer (DPO): Radostina Nedeva-Maegerlein: dpo@emsa.europa.eu</p>
2) Who is actually conducting the processing? (Article 31.1(a))⁴
<p>The data is processed by EMSA itself x</p> <p>The organisational unit conducting the processing activity is: Unit 4.1 Human Resources and Internal Support</p> <hr/> <p>The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party x</p> <p>Externally contracted insurance company</p> <p>International SOS GmbH</p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p> <p>Jan Philipp Roos, Business Development Director, Government Lead, International SOS GmbH</p>

¹ **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.

² In case of more than one controller (e.g. joint operations), all controllers need to be listed here

³ This is the unit that decides that the processing takes place and why.

⁴ Is EMSA itself conducting the processing? Or has a provider been contracted?

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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.

The personal data are being processed in order to provide Travel Risk Management Services to fulfil the duty of care and guarantee the safety and security of European Union Institutions' staff during their business related travels.

The contractor will provide EMSA staff (and their management) with a comprehensive service to ensure their safety while travelling for and on behalf of EMSA and to ensure that the agency is fully compliant with all statutory duty of care obligations.

The services to be delivered include an assessment of the Agencies' travel risk, the development of a Travel Risk Management Policy, the development and delivery of a staff training and awareness program on travel safety and, the provision of an emergency response service for staff travelling on the Agencies business.

Based on monitored travel and threat data, the services to be provided by the contractor will include keeping the travellers aware of actual or emerging situations, making recommendations and provide the necessary advice and support, up to and including coordination of worldwide emergency assistance, security, medical and natural disaster evacuation.

In order to provide the service, the contractor needs to be informed of the mission arrangements of EMSA's travellers. For this purpose, a feed will be established between the contractor and EMSA's contracted travel agency service, whereby the contractor will automatically receive details of the travel arrangements.

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) ☒
(Examples of legal basis: e.g. Article 2 'Core tasks of the Agency', par.4 b) EMSA founding regulation)
Regulation (EC) No 1406/2002 of the European Parliament and of the Council of 27 June 2002 establishing a European Maritime Safety Agency, as amended, in particular providing the core and ancillary tasks foreseen under Articles 2 and 3.
- (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) ☐

5) Description of the categories of data subjects (Article 31.1(c)) <i>Whose personal data are being processed?</i>	
EMSA staff	x
Non-EMSA staff (contractors staff, external experts, trainees)	x
Trainees and external experts may on occasion be asked to go on mission for EMSA. For practical reasons, EMSA may also organise the missions for representatives from third countries.	
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) General personal data:	
The personal data contains:	
Personal details (name, address etc)	x
Name of staff member (first and last name), e-mail address and mobile phone number. The date of birth of the traveller will also be required in the event that a staff member contacts one of the contractor's assistance centres for help during their mission.	
Education & Training details	<input type="checkbox"/>
Employment details	<input checked="" type="checkbox"/>
Name of the employer.	
Financial details	<input checked="" type="checkbox"/>
Bank account in case the staff member makes a claim.	
Family, lifestyle and social circumstances	<input type="checkbox"/>

Goods or services provided	<input type="checkbox"/>
Other (please give details): Booking details of flights and accommodation.	<input checked="" type="checkbox"/>
(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))	
<i>Recipients are all parties who have access to the personal data</i>	
Data subjects themselves	x
Managers of data subjects	<input type="checkbox"/>
Designated EMSA staff	x
<ul style="list-style-type: none"> Members of the Missions Team/Bureau of the Executive Director involved with the organisation of missions HR Officer/Senior HR Officer acting as project officer for the management of the contract 	
Other (please specify):	
<ul style="list-style-type: none"> Staff of the external contractor responsible for providing the services. Access will be given to EU staff with the statutory right to access the data required by their function, i.e. the European Ombudsman, the Civil Service Tribunal, the Internal Audit Service, the European 	

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 ☐

An excel file is kept on the H drive which is restricted for HR use only.

Outlook Folder(s) ☐

Hardcopy file	<input type="checkbox"/>
Cloud (give details, e.g. public cloud)	<input type="checkbox"/>
Servers of external provider	x
Other (please specify):	
<p>10) Retention time (Article 4(e))</p> <p><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 here.</i></p>	
<p>7 years in line with the guidelines on Mission information management in EMSA's Records Management Policy and Procedures.</p>	