

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

NAME OF PROCESSING ACTIVITY:

Audio Recordings of the EMSA Administrative Board meetings and meetings of the Administrative and Finance Committee, both presential and online.

1) Controller of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA), Head of the Executive Office [acting as delegated EMSA data controller: ab.secretariat@emsa.europa.eu</p> <p>Organisational unit responsible for the processing activity: Executive Office</p> <p>Contact person: Head of the Executive Office: ab.secretariat@emsa.europa.eu</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)) ¹
<p>The data is processed by EMSA itself and with its own equipment, assisted by a contractor for operating the equipment. <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: Executive Office</p>
<p>The data is processed by a third party (contractor) or the processing operation is conducted together with an external third party <input type="checkbox"/></p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer):</p>

3) Purpose of the processing (Article 31.1(b))
<p><i>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.</i></p>
<p>EMSA conducts three Administrative Board meetings per year, in March, June and November. Each of the Administrative Board meetings are preceded by meetings of the Administrative and Finance Committee that are held online and more or less a week before the Board meetings. As per Article 11 – <i>Transmission of documents; minutes of meetings</i> - of the Rules of Procedure of the Administrative Board a summary of decisions taken at each meeting and the draft minutes of the meetings are being forwarded to members not later than four weeks after the end of the meetings. The draft minutes are then approved at the following</p>

¹ Is EMSA itself conducting the processing? Or has a provider been contracted?

meeting of the Administrative Board. Once approved, the final text of the minutes is signed by the Chairman of the Administrative Board and forwarded to members not later than two weeks after its approval.

Meetings of the Administrative and Finance Committee are held in order to prepare the meetings of the Administrative Board. As per practice established in March 2025, a Summary Report is being sent to the Administrative Board for information on discussions held.

To facilitate the drafting of the minutes of the meetings, EMSA decided to record in audio the EMSA Administrative Board and Administrative and Finance Committee meetings.

Upon approval of the minutes and of the Summary Reports at the following meetings, the recordings of the meetings – both the ones held online and presential - would be deleted by the relevant EMSA staff.

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)
- (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) ☐

The EMSA Administrative Board members and their alternates will be informed by the Executive Director at the next Administrative Board meeting in June 2025.

5) Description of the categories of data subjects (Article 31.1(c))

Whose personal data are being processed?

- EMSA staff ☒
EMSA staff participating of the meetings
- Non-EMSA staff ☒
Members of the Administrative Board and their alternates.
Contractor operating the equipment for recordings.
- Visitors to EMSA building ☐
- Relatives of the data subject ☐

Other (please specify):

6) Categories of personal data processed (Article 31.1(c))

Please tick all that apply and give details where appropriate

(a) **General personal data:**

The personal data contains:

Personal details ☒

Education & Training details ☐

Employment details ☒

Financial details ☐

Family, lifestyle and social circumstances ☐

Goods or services provided ☐

Other (please give details):

Audio (voice) recordings of the proceedings of the EMSA Administrative Board and the proceedings of the Administrative and Finance Committee meetings.

(b) **Sensitive personal data** (Article 10)

The personal data reveals:

Racial or ethnic origin ☐

Political opinions ☐

Religious or philosophical beliefs ☐

Trade union membership ☐

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 | <input type="checkbox"/> |
| Managers of data subjects | <input type="checkbox"/> |
| Designated EMSA staff members
Only staff responsible for recording of meetings, their drafting and approval. | <input checked="" type="checkbox"/> |
| Designated Contractors' staff members
Contractor operating the equipment for the recording and only during the recording.
Other (please specify): | <input checked="" type="checkbox"/> |

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 | <input type="checkbox"/> |
| No | <input checked="" type="checkbox"/> |

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"/>								
9) Technical and organisational security measures (Article 31.1(g)) <i>Please specify where the data are stored during and after the processing</i>									
<p>How is the data stored?</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 70%;">EMSA network shared drive</td> <td style="text-align: right; width: 30%;">☒</td> </tr> <tr> <td>Outlook Folder(s)</td> <td style="text-align: right;">☐</td> </tr> <tr> <td>Hardcopy file</td> <td style="text-align: right;">☐</td> </tr> <tr> <td>Cloud (give details, e.g. public cloud)</td> <td style="text-align: right;">☒</td> </tr> </table> <p>For meetings held by ZOOM, recordings will be stored locally on a laptop and the EMSA staff who will be able to delete the recordings upon the approval of the minutes.</p> <p>Servers of external provider ☐</p> <p>Other (please specify):</p>		EMSA network shared drive	☒	Outlook Folder(s)	☐	Hardcopy file	☐	Cloud (give details, e.g. public cloud)	☒
EMSA network shared drive	☒								
Outlook Folder(s)	☐								
Hardcopy file	☐								
Cloud (give details, e.g. public cloud)	☒								
10) Retention time (Article 4(e)) <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>									
<p>The video recordings would be deleted upon approval of the relevant minutes by the EMSA Administrative Board, as follows:</p> <ul style="list-style-type: none"> - Minutes of March meetings – approval at June meetings - Minutes of June meetings – approval at November meetings - Minutes of November meetings – approval at March meetings <p>The data will be only retained for a maximum period of 6 months.</p>									