

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

NAME OF PROCESSING ACTIVITY¹: **Management of EMSA Business cards – electronic versions**

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: 0.1 Unit – Executive Office</p> <p>Contact person: commsdp@emsa.europa.eu - 0.1 Unit – Executive Office</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 <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: 0.1 Unit – 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 checked="" type="checkbox"/></p> <p>Electronic cards: “QR Code Generator” by Bitly Europe: Privacy Policy - Bitly</p> <p>Bitly Europe Zehdenicker Straße 1 / Post Code 10119 / Berlin, Germany</p> <p>Contact point at external third party (e.g. Privacy/Data Protection Officer): datenschutz@dataguard.de</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?

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 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.qr-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.

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) | <input checked="checked" type="checkbox"/> |
| (b) | compliance with a legal obligation to which EMSA is subject | <input type="checkbox"/> |
| (c) | necessary for the performance of a contract with the data subject or for the preparation of such a contract | <input type="checkbox"/> |
| (d) | Data subject has given consent (<i>ex ante</i> , explicit, informed) | <input type="checkbox"/> |
- Describe how consent will be collected and where the relevant proof of consent will be stored

5) Description of the categories of data subjects (Article 31.1(c)) <i>Whose personal data are being processed?</i>	
EMSA staff Officials, Temporary Agents and Contract Agents	<input checked="" type="checkbox"/>
Non-EMSA staff (contractors staff, external experts, trainees) Seconded National Experts, Trainees, Interims and NEPTs	<input checked="" type="checkbox"/>
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) First Name and Surname	<input checked="" type="checkbox"/>
Education & Training details	<input type="checkbox"/>
Employment details Job title , e-mail, work phone, and mobile phone (only for staff with EMSA mobile phones)	<input checked="" type="checkbox"/>
Financial details	<input type="checkbox"/>
Family, lifestyle and social circumstances	<input type="checkbox"/>
Goods or services provided	<input type="checkbox"/>
Other (please give details):	

(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 ☒

Managers of data subjects ☐

Designated EMSA staff members ☒
Communications Team of the Executive Office

Designated Contractors' staff members ☒

Other (please specify):

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 ☒

Outlook Folder(s) ☐

Hardcopy file ☐

Cloud ☐

Servers of external provider (dynamic business cards are kept in providers cloud) ☒

Other (please specify): Intranet

10) Retention time (Article 4(e))

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.

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