

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

NAME OF PROCESSING ACTIVITY: School visits to EMSA

1) Controller(s) of data processing operation (Article 31.1(a))
<p>Controller: European Maritime Safety Agency (EMSA)</p> <p>Organisational unit responsible for the processing activity: Department 4 – Corporate Services</p> <p>Contact person: Dominika Łempicka-Fichter</p> <p>Data Protection Officer (DPO): dpo@emsa.europa.eu</p>
2) Who is actually conducting the processing? (Article 31.1(a))
<p>The data is processed by EMSA itself <input checked="" type="checkbox"/></p> <p>The organisational unit conducting the processing activity is: Department 4 – Corporate Services</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>The purpose of the processing activity is to manage school visits to EMSA's premises. The processing is necessary to ensure security, comply with access control requirements, and enable effective organisation of the event.</p> <p>The processing steps are as follows:</p> <ol style="list-style-type: none"> 1. Collection – receiving identification details (student name and school name) from the school or student group organiser; 2. Registration – relevant data is shared with EMSA security and with the EMSA staff member responsible for the school's visit; 3. On the day of the visit – EMSA staff member responsible for the school visit will provide badges for students and teachers, ensure escort and access restrictions are respected;

A consent form will also be provided to students to collect their signatures for data processing, particularly regarding:

- name and surname for printing badges, certificates and other distinctions/documents to be delivered on the day of the visit;
- photographing, video and audio recording on the day of the visit;
- publication of the above-mentioned photos, audio and videos in EMSA communication channels, including social media (Facebook, Instagram and LinkedIn).

If the student is at least 13 years old, the consent form must be signed by the parental guardian of the child. EMSA will not reuse the personal data for another purpose that is different to the one stated above.

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) ☒

(Legal basis: Article 4(2) 'Transparency and protection of information', EMSA founding regulation)

compliance with a legal obligation to which EMSA is subject ☐

- (b) necessary for the performance of a contract with the data subject or for the preparation of such a contract ☐

- (c) Data subject has given consent (*ex ante*, explicit, informed) ☒

Additional legal basis: Article 8 **Conditions applicable to a child's consent in relation to information society services**

Where point (d) of Article 5(1) applies, in relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 13 years old. *Where the child is below the age of 13 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.*

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

Whose personal data are being processed?

EMSA staff ☐

Non-EMSA staff (contractors' staff, external experts, trainees): ☒

Students and teachers visiting EMSA.

Visitors to EMSA building ☐

Relatives of the data subject ☐

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 and surname of teachers and students	<input checked="" type="checkbox"/>
Education & Training details: schools name, address and school year	<input checked="" type="checkbox"/>
Employment details	<input 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): Image and voice of the teachers and students participating in the school visit.	
(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:	<input checked="" type="checkbox"/>
Managers of data subjects	<input type="checkbox"/>
Designated EMSA staff members:	
Staff members of the Department 4 – Corporate Services and Executive Office	<input checked="" type="checkbox"/>
Designated Contractors' staff members	<input checked="" type="checkbox"/>
Security guards working in EMSA's reception	
Other (please specify): Photographs and recordings of the visit will be shared on EMSA's social media channels, making them accessible to the general public.	
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 (give details, e.g. public cloud)

☐

Servers of external provider

☐

Other (please specify): EMSA Social Media Channels

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.

Photographs and recordings of the school visits, taken as part of a communication plan to promote EMSA policies and activities among internal or external groups, are retained for two years.

After this period, they are archived separately for historical purposes. The names and surnames of teachers and students will be deleted one year after the visit.

Regarding publication on social media, the relevant Data Protection policies of the respective channels will apply.