

Data Protection Statement/Privacy Statement on the processing of personal data in the context of the Management of the VéloMai cycling campaign at EMSA

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 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 2018/1725.

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

The purpose of the processing of personal data is:

In line with the objectives of EMSA's Greening project, Environmental Statement and Programme, EMSA joined the Commission's VéloMai interinstitutional cycling campaign, which aims to motivate people to cycle to work, thus developing the habit of cycling regularly.

EMSA staff interested to participate are invited to register using their ECAS account by downloading the app VéloMai to their mobile phone or laptop. The app belongs to the European Commission and is used across all institutions participating in the cycling campaign, which Privacy Statement can be found here: [VéloMai \(europea.eu\)](https://europea.eu).

Staff are invited to inform the Greening Team (via dedicated email address) that they registered, for planning purposes only. No individual tracking will be done. By the end of the month, for the attribution of the prizes, staff is invited to send (to the dedicated email address) a screenshot of the app with the total kms / number of rides visible.

The Greening Team (Dep 4.0 and Unit 4.1) will then process the data - Name of staff member and participation data (kms made on bicycle and number of times cycled) - to be able to award EMSA trophies. The winners of 5 categories (Best Female Km, Best Female N of rides, Best Male Km, Best Male N of rides and Best Group) will receive an EMSA VéloMai trophy. With experience gained some additional categories may be established in years to come based on the aggregate data collected.

EMSA will advertise this campaign on social media, intranet, and internet as well as EMSA newsletter, including pictures sent by staff during their cycling tours.

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

The processing is not intended to be used for any automated decision making, including profiling.

2. Categories/types of personal data processed

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

- **Personal details** (name): Name
- **Family, lifestyle and social circumstances**: kms made on bicycle and number of times cycled during May
- **Other**: Photos of staff - EMSA will advertise this campaign in social media, intranet and internet as well as EMSA newsletter, including the pictures sent by staff during their cycling tours.

3. Processing the personal data

The processing of the personal data is carried out under the responsibility of the Head of Department 4, acting as delegated EMSA data controller.

Personal data are processed by:

- EMSA Dep. 4.0 and Unit 4.2 – Legal, Finance and Facilities
- The European Commission HR.D.1 – for the use of the Vélomai app which Privacy Statement can be found here: Vélomai (europa.eu). Contact point at external third party (e.g. Privacy/Data Protection Officer): DATAPROTECTIONOFFICER@ec.europa.eu

4. Access to and disclosure of personal data

The personal data is disclosed to the following recipients:

EMSA staff members

- Head of Department 4
- Designated colleagues from 4.0 and 4.2 Unit in charge of the Greening project
- Webmaster
- Designated colleagues from Communication Unit in charge of EMSA's social media
- All staff, as photos will be published in the Intranet and/or EMSA's social media

Other: Photos will be used to make EMSA social media communication: will be available to the general public.

The data are not used for any other purposes nor disclosed to any other recipient.

The information in question will not be communicated to third parties, except where necessary for the purpose(s) outlined above.

Personal data are not intended to be transferred to third countries.

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 the Management of the VéloMai cycling campaign at EMSA are 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 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 Department 4 - Corporate Services.

The right of rectification can only apply to inaccurate or incomplete factual data processed within the **the Management of the VéloMai cycling campaign at EMSA**.

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 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) of the Regulation 2018/1725.

The personal data are collected and processed in accordance with:

- Greening EMSA: VéloMai 2022 – ARES ref [emsa.4.adm\(2022\)3357359](#)
- Adoption of Environmental Management System – ARES ref [emsa.4.adm\(2020\)8404562](#)
- Updated version of Environmental Statement, Manual and associated documents following 2nd stage of EMAS Verification audit – ARES ref [emsa.4.adm\(2022\)452575](#)

8. Storing Personal data

EMSA does not keep personal data longer than necessary for the purpose(s) for which that personal data is collected.

Category EMSA.6.2 of the EMSA retention list sets that the administrative retention period for files related to actions based on a communication plan to promote EMSA policies and activities among internal or external groups is 2 years. After that period, the files are transferred to the EMSA historical archives. With regard to the publication on social media, the relevant Data protection policies of the channels will apply.

For the retention period of the data for the use of the VéloMai app, the Privacy Statement can be found here: VéloMai ([europa.eu](#))

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, Head of Department 4 – Corporate Services under the following mailbox: greening@emsa.europa.eu.

Any data subject may also consult EMSA Data Protection Officer at: 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.