

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

NAME OF PROCESSING ACTIVITY¹: **EMSA WI-FI Guest Network**

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: Head of Unit 3.2 Digital Infrastructure</p> <p>Contact person: Ivo Kupsky – Head of Unit 3.2</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: Unit 3.2 Digital Infrastructure</p> <hr/> <p>The data is processed by a third party (contractor) <input checked="" type="checkbox"/> or the processing operation is conducted together with an external third party</p> <p>NOS Comunicações SA</p> <p>Contact point (e.g. Privacy/Data Protection Officer): dpo.privacidade@nos.pt</p>

3) Purpose of the processing (Article 31.1(b))
<i>Why are the personal data being processed? Specify the rationale and underlying reason for the processing</i>

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?

and describe the individual steps used for the processing.

The purpose of the processing activity is to give temporary access to guests in EMSA building (visitors and contractors) to the internet by using the Wi-Fi Guest network at EMSA's premises.

EMSA's guests access the Wi-Fi guest portal with a generic password that guarantees access to the portal, where the user must accept the terms and conditions and provide consent for the data processing.

The guest Wi-Fi password is published in the emsanet. The service is primarily addressed to EMSA guests. Nevertheless, any person can use the network if they have access to the password and if they are at EMSA's premises.

The data processed are deleted after 6 months.

The processing of data is made by keeping a record of the Dynamic IP Address and the MAC address of the electronic device used to connect to the guest-Wi-Fi network and the URL's of the websites that were visited during the Wi-Fi-session. The processing of data is necessary also to control the quality and the use of the service, to facilitate return to the network so that the user does not have to register successively over a short period of time and security reasons to avoid misuse of the service (hacking, access contents of illegal nature, etc).

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) ☒

Describe how consent will be collected and where the relevant proof of consent will be stored.

The user will consent to the processing of the data by the contractor. The Contractor will collect the data subject's consent which will be triggered by data subjects ticking an opt-in box electronically. The user is not able to access the service without checking in the box so the logs of the system keeps the IP address and MAC address of the device connected only after the agreement.

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

Whose personal data are being processed?

EMSA staff ☒

Officials, Temporary Agents and Contract Agents

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

Seconded National Experts, Trainees, Interims, NEPTs, contractors staff

Visitors to EMSA building ☒

Experts, authorities, contractors, participants of events and trainings, etc.

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 (name, address etc) ☐

Education & Training details ☐

Employment details ☐

Financial details ☐

Family, lifestyle and social circumstances ☐

Goods or services provided

Other (please give details): ☒

Dynamic IP Address and MAC address of the device used to access the network, to facilitate return to the network so that the User does not have to register successively over a short period of time.

URL's of the websites that were visited during the Wi-Fi-session.

(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 ☒
• Service Desk staff

Designated Contractors' staff members ☒
• NOS staff have access to the application's log

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 (give details, e.g. public cloud) ☐

Servers of external provider



Other (please specify):

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.

Personal data is kept for 6 months after the registration.