

# EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF  
**PROCESSING PERSONAL DATA RELATED TO  
HR DATA MODULE OF COMMON SECURITY AND DEFENCE POLICY (CSDP) MISSIONS COLLECTED AND MAINTAINED BY THE  
CPCC DIRECTORATE OF THE EUROPEAN EXTERNAL ACTION SERVICE (EEAS) AND BY CIVILIAN CSDP MISSIONS**

## 1. INTRODUCTION

THE PROTECTION OF YOUR PRIVACY INCLUDING YOUR PERSONAL DATA IS OF GREAT IMPORTANCE TO THE EUROPEAN EXTERNAL ACTION SERVICE (EEAS) AND EUROPEAN UNION MONITORING MISSION IN GEORGIA. WHEN PROCESSING PERSONAL DATA WE RESPECT THE PRINCIPLES OF THE CHARTER ON FUNDAMENTAL RIGHTS OF THE EUROPEAN UNION, AND IN PARTICULAR ARTICLE 8 ON DATA PROTECTION.

THIS PRIVACY STATEMENT DESCRIBES HOW THE EEAS AND EUROPEAN UNION MONITORING MISSION IN GEORGIA PROCESSES YOUR PERSONAL DATA FOR THE PURPOSE IT IS COLLECTED AND WHAT RIGHTS YOU HAVE AS A DATA SUBJECT. YOUR PERSONAL DATA BY THE EEAS IS PROCESSED IN ACCORDANCE WITH REGULATION (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 23 OCTOBER 2018 ON THE PROTECTION OF NATURAL PERSONS WITH REGARD TO THE PROCESSING OF PERSONAL DATA BY THE UNION INSTITUTIONS, BODIES, OFFICES AND AGENCIES AND ON THE FREE MOVEMENT OF SUCH DATA, AND REPEALING REGULATION (EC) NO 45/2001 AND DECISION NO 1247/2002/EC AS OF 11 DECEMBER 2018, ALIGNED WITH PROVISIONS OF THE GENERAL DATA PROTECTION REGULATION /REG. (EU) 2016/679/ AND IN ACCORDANCE WITH THE CIVOPSCDR INSTRUCTION 12-2018 AND ITS SUBSEQUENT AMENDMENT(S) ON THE SOP ON THE PROTECTION OF PERSONAL DATA FOR CSDP MISSIONS BY THE CSDP MISSIONS.

ALL DATA OF PERSONAL NATURE - DATA THAT CAN IDENTIFY YOU DIRECTLY OR INDIRECTLY - IS HANDLED WITH THE NECESSARY CARE.

## 2. PURPOSE OF DATA PROCESSING: Why do we process your data?

The main purpose of the data processing activity is to develop and uphold a secure, centralised HR database for the Civilian CSDP Missions to replace the locally proliferated Mission databases. The HR database is an innovative solution to provide the civilian CSDP missions and the EEAS with a common IT platform to manage personal data for HR-related processes. The centralised HR database, in particular

- facilitates the administration of the HR data in the Missions
- digitalises the "Check in and check out processes" for newcomers and staff leaving the Missions;
- simplifies the setup of new Missions;
- facilitates the Missions, the CPCC and the MS with staff related statistics and HR-related reports. (as gender, age, positions, end of mission);
- enables a smoother planning of deployment of Mission staff in short and long term;
- supports the technical solution to broaden the scope of compartments at a later stage to get a complete HR process system allowing additional compartments, such as payroll, rotation of personnel, duty of care and asset management functionalities.

## 3. DATA PROCESSED: What data do we process?

The data, including personal data, which may be processed for that purpose are the following:

I.

1. Surname(s) and middle name(s) and first name(s)
2. Staff ID
3. Mission ID card number
4. Gender
5. Nationality(s)
6. Country of birth and place of birth (city)
7. Date of birth
8. Driving licence (category)
9. Arrival date (to the Mission)
10. Renewal of the contract/extension of the tour of duty (if relevant)
11. End of Mission date
12. Regime (seconded/contracted/local)
13. Title/Function/position
14. Responsibility (including thematic portfolio/area)
15. Professional phone number with extension
16. Professional mobile phone number
17. Redeployment within the Mission
18. Identification of third country staff members (tick box)

II.

19. Address (residence)

20. Private e-mail address
- III.
21. Marital status
22. Private mobile /or fix/ phone number (if relevant, for emergency purpose)
23. Driving licence (number, category, expiration date, issuing country)
24. Emergency contact person (name, relationship, address, phone number)
25. Blood type
26. Passport number, issue and expiry dates
27. Insurance card number
28. Security Clearance, issue and expiry dates

#### 4. DATA CONTROLLER: Who is entrusted with processing your data?

The Controllers determining the purpose and the means of the processing activity is the European External Action Service and Civilian CSDP Missions. The representative of the controller, the EEAS Directorate responsible for managing the personal data processing under the supervision of the Director is the following entity:

EEAS Civilian Planning and Conduct Capability Directorate (CPCC) and the EEAS Mission Support Division (CPCC.3)

Joint controllers are the all Civilian CSDP Missions (EULEX Kosovo, EUMM Georgia, ECAP Sahel Mali, EUCAP Sahel Niger, EUCAP Somalia, EUBAM Rafah, EUBAM Libya, EUPOL COPPS, EUAM Ukraine, EUAM Iraq) for the data collected in their respective Missions.

#### 5. RECIPIENTS OF THE PERSONAL DATA: Who has access to your data?

- Head of HR section, CPCC/MSD – only on a need to know/need to do basis [administrator rights]
- Assigned staff of the CPCC/MSD/HR personnel – only on a need to know basis, limited to data 1-18 as listed under the section '3.DATA PROCESSED', stored in separate compartments [viewer rights only]
- Assigned staff of the CPCC.3/MSD/security personnel – in case of emergency only on a need to know basis, limited to certain compartments, with only [viewer rights only]
- Assigned staff of the CPCC.3/MSD/MSP IT personnel – only on a need to know/need to do basis [administrator right]
- Assigned CSDP Mission Members responsible for HR in the respective Missions – on a need to know/need to do basis, [administrator rights]
- Assigned CSDP Missions' security personnel – in case of emergency only on a need to know basis, limited to certain compartments [viewer rights]

#### 6. ACCESS, RECTIFICATION, ERASURE OF DATA: What rights do you have?

You have the right to access your personal data and the right to request for correction of any inaccurate or incomplete personal data, as well as to request the removal of your personal data, if collected unlawfully, which will be implemented within 10 working days after your request has been deemed legitimate. If you have any questions concerning the processing of your personal data, you may address them to the following functional mailbox of the respective Data Controller:

CPCC MSD (CPCC-MSD-SECRETARIAT@eeas.europa.eu).

[contact@eumm.eu](mailto:contact@eumm.eu)

#### 7. LEGAL BASIS: On what grounds we collect your data?

Legal basis:

- Conclusions of the Council (8022/16) on the Mission Support Platform
- Point 17/A. of the Conclusions of the Council on CSDP (8971/15) on the role of the Mission Support Platform
- Point 13 of the Conclusions of the Council (9178/17) on the Security and Defence in the context of the EU Global Strategy
- Point 10 of Conclusions of the Council (14305/18) on the establishment of a Civilian CSDP Compact on enhancing Human Resource management of CSDP Missions adopted on 18 November 2018
- Council Decisions establishing the respective Civilian CSDP Missions
- Annex X of the Operational Plans (OPLANs) of the respective 10 Civilian CSDP Missions
- Human Resource Handbook 2017
- Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Communities
- [PROC HR\(2011\)0013](#) of 22/11/2011 on general implementing provisions giving effect to the Staff Regulations and to the Conditions of Employment of Other Servants
- [PROC EEAS\(2011\)002](#) of 29/11/2011 to extend the application of certain Commission Rules developing the provisions of the Staff Regulations and of the Conditions of Employment of Other Servants, to the EEAS
- Article 1 (Nature and Scope), 2 (Tasks) of the Council Decision of 26 July 2010 establishing the organisation and functioning of the European External Action Service (2010/427/EU) available on [http://www.eeas.europa.eu/background/docs/eeas\\_decision\\_en.pdf](http://www.eeas.europa.eu/background/docs/eeas_decision_en.pdf)

Good administrative practices, contacts and cooperation necessary for the EEAS to perform its tasks pursuant to the Treaty on the Functioning of the European Union and the aforementioned Council Decision establishing the EEAS.

#### 8. TIME LIMIT - DATA STORING: For what period and how we process your data?

Retention of data:

- All personal data are organised in electronic compartments and stored only for the duration of employment/tour of duty of the CSDP Mission Members. On a proportionate basis and limited to the necessity certain categories of data are retained beyond the period of activity, to the extent until these data are in relation to remaining rights or obligations.
- Personal data related to the employment/secondment (1-18 as listed under section '3. DATA PROCESSED') are retained for 10 years as of the closure of the Mission.
- When appropriate, personal data contained in supporting documents should be deleted if possible, where these data are not necessary for further purposes, e.g. control, inspection and audit.
- In case of a judiciary procedure related to employment of contracted staff or tour of duty of the seconded staff, personal data is kept for 5 years after the final judgment was rendered. In case of a complaint launched before the European Ombudsman, the EDPS or other competent authorities, personal data is kept for 2 years after the closure of the case.

Security of data:

Appropriate organisational and technical measures are ensured:

- In its electronic format the data will be stored in a cloud located within the EU. The collected personal data are processed by assigned staff members. Files have authorised access. The database is accessible only to the recipients with the authorised administrative or viewer rights.
- Security is also ensured by the safety measures built in the various IT applications used.
- In case of processing personal data that contains more sensitive information such as blood type, it is handled with the necessary care and is not intended to be disclosed or shared with third parties without consent from its subject(s), except for vital interest of the data subject.
- Measures are provided by DIGIT/EEAS and the MSP CIS department to prevent non-responsible entities from access, alteration, deletion, disclosure of data.

#### **9. EEAS DATA PROTECTION OFFICER: Any questions to the DPO?**

After having exhausted your possibilities to submit queries to the EUROPEAN UNION MONITORING MISSION IN GEORGIA, you can also contact the EEAS Data Protection Officer at [data-protection@eeas.europa.eu](mailto:data-protection@eeas.europa.eu).