



# EUROPEAN UNION MONITORING MISSION IN GEORGIA PRIVACY STATEMENT

## FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO

### **Medical data / Medical Service in the European Union Monitoring Mission in Georgia**

#### **1. INTRODUCTION**

The protection of your privacy including your personal data is of great importance to the European Union and to European Union Monitoring Mission in Georgia (EUMM). 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 EUMM processes your personal data for the purpose it is collected and what rights you have as a data subject. Your personal data by the EUMM 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 THE PROCESSING: Why we process your data?**

The main purpose of the data processing activity is to provide medical and psychological support (including treatment and advice) to Mission staff members.

#### **3. DATA PROCESSED: what data we process?**

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

- surname(s) and middle name(s) and first name(s)
- date and place of birth
- gender
- nationality(s)
- country of birth and place of birth (city)
- background information
- home address (residence)
- insurance reference number
- mission id number
- personal phone details
- mission phone
- mission e-mail
- blood type
- medical opinions (reports from General Practitioner, Medical Specialists, Medical expertise, Hospitalisation reports, Medical Advisor, Psychologist)
- sick leave certificates
- individual medical files
- vaccination certificate
- pregnancy confirmation certificates

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

Data Controller:

European Union Monitoring Mission in Georgia  
Represented by the Head of Mission, Erik Høeg

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

The recipients of the data are the following, on a strict "need-to-know policy" basis:

- Medical Adviser
- Mission Medical Coordinator
- CIGNA or other designated insurance company providing health care for the Mission staff
- In relation to Code of Conduct, (CoC cases also Investigation Officer, advisory Disciplinary Board(s) and Responsible Authority) only the times of sick leave, never the actual substance of the sickness/details of the medical case.

#### **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:

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

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

- Council Decision: COUNCIL JOINT ACTION 2008/796/CFSP and its subsequent amendments, latest being COUNCIL DECISION (CFSP) 2016/2238
- OPLAN EEAS (2018) 1069 rev 1
- Civilian Operations Commander Instruction 12/2018 on the SOP on Personal Data Protection

The processing is needed for the execution of the Mission mandate and HoMs' duty of care for security.

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

Retention of data:

- All medical data of the Mission member is kept/processed until Mission member is in the Mission.
- Medical files are kept for 2 years after the end of Mission of the concerned Mission member.
- Administrative note for medical evacuations is retained 10 years or In case of a judiciary procedure related to employment of contracted staff or tour of duty of the seconded staff, 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 ther 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 computer located within the Mission. 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 CIS section to prevent non-responsible entities from access, alteration, deletion, disclosure of data.

The Mission has a system for the destruction of documents after the retention period expired. The system ensures the protection of the information contained in the document by permanent destruction, such as shredding, burning or deletion of back-up files in case of electronic data storage.

**9. MISSION DATA PROTECTION ADVISOR: Any questions to the MDPA**

In case you have questions related to the protection of your personal data, you can also contact the Mission Data Protection Advisor (MDPA) EUMM Legad, at the functional mailbox of the Mission [contact@eumm.eu](mailto:contact@eumm.eu)

**10. RECOURSE**

You have at any time the right of recourse that you may send to the Head of the Mission of EUMM, with the MDPA in copy.