

(To be filled out in the EDPS' office)

NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 16/04/2014

CASE NUMBER: 2014-0447

INSTITUTION: EEAS EUROPEAN EXTERNAL ACTION SERVICE

LEGAL BASIS: ARTICLE 27-5 OF THE REGULATION CE N° 45/2001⁽¹⁾

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

Katja AFHELDT
Head of Division
MDR Division C4 – Career and Learning Development
EEAS JOYE 7/191

2/ ORGANISATIONAL PARTS OF THE INSTITUTION OR BODY ENTRUSTED WITH THE PROCESSING OF PERSONAL DATA

MDR Division C4 – Career and Learning Development

3/ NAME OF THE PROCESSING

Hostile Environment Awareness Training – (HEAT)

4/ PURPOSE OR PURPOSES OF THE PROCESSING

Purpose(s) of the processing operation

The purpose of the present processing operation is to provide adequate training (HEAT), including photographing and video of certain training sequences for the purpose of the training solely.

Description of the process

Personal data are collected before the start of the training and deleted just after. Only participation to the course remain registered in the SYSLOG/SYSPER systems, IT systems designed for recording this type of information.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Data are processed from the following individuals or group of people:

- Officials, Temporary Agents and Contract Agents of the EEAS
- Officials, Temporary Agents and Contract Agents of the EP, EC and GSC

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA

(including, if applicable, special categories of data (Article 10) and/or origin of data)

The data which will be processed for that purpose are the following:

- Identification of the training participant (Names, Institution, place of duty)
- Mobile phone number (for emergency contacts outside working hours, as training partly during weekend)
- Eventual diet or food allergy (the training is residential and food is solely provided by Training Centre, no other possibilities of catering)
- Inquiry on adequate health situation to attend the training (to either adapt the training to specific cases or to exclude participants from certain physically demanding parts)

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

A Privacy Statement linked to this Notification contains all information provided to the Data Subject(s).

The aforementioned distinct Privacy Statement is provided to the participant attached to the invitation to the training.

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

(Rights of access, to rectify, to block, to erase, to object)

Data subjects have the right to access their personal data and the right to correct any inaccurate or incomplete personal data, as well as to request the removal of their personal data, which will be implemented within 10 working days after the request will have been deemed legitimate. If the data subject has any queries concerning the processing of his/her personal data, s/he may address them to the data controller at the following functional mailbox: TRAINING-CORP-SECURITY@EEAS.EUROPA.EU

9/ AUTOMATED / MANUAL PROCESSING OPERATION

Manual.

10/ STORAGE MEDIA OF DATA

Secured central server (common drive division – secured area).

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Art 3 & 11 of the Decision of the High Representative of the Union for Foreign Affairs and Security Policy on the security rules for the EEAS - HR DEC(2013) 006 of 19/04/2013 (mandatory or highly recommended training).

Further legal reference:

Good administrative practices in the framework of the Treaty of Lisbon and 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

12/ THE RECIPIENTS OR CATEGORIES OF RECIPIENT TO WHOM THE DATA MIGHT BE DISCLOSED

The recipients of your data will be EEAS MDR C4 and the training provider (Bundeswehr as UN trainer, under Framework contract)

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

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

Your data will be retained for a maximum period of 3 months (once all reporting on the training by the training provider is proceeded with). Data will be automatically removed at the end of this period.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS
(Please, specify the time limits for every category, if applicable)

Justified requests are treated within 5 working days after the request will have been deemed legitimate.

14/ HISTORICAL, STATISTICAL OR SCIENTIFIC PURPOSES

(If you store data for longer periods than mentioned above, please specify, if applicable, why the data must be kept under a form which permits identification)

N/A

15/ PROPOSED TRANSFERS OF DATA TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

NONE.

16/ THE PROCESSING OPERATION PRESENTS SPECIFIC RISK WHICH JUSTIFIES PRIOR CHECKING (Please describe)

AS FORESEEN IN:

☒ Article 27.2.(a)

(Processing of data relating to health and to suspected offences, offences, criminal convictions or security measures,)

Certain health aspects are considered, and therefore personal data related to the health condition is collected, such as

- Eventual diet or food allergy (the training is residential and food is solely provided by Training Centre, no other possibilities of catering)
- Inquiry on adequate health situation to attend the training (to either adapt the training to specific cases or to exclude participants from certain physically demanding parts)

☐ Article 27.2.(b)

(Processing operations intended to evaluate personal aspects relating to the data subject,)

☐ Article 27.2.(c)

(Processing operations allowing linkages not provided for pursuant to national or Community legislation between data processed for different purposes,)

☐ Article 27.2.(d)

(Processing operations for the purpose of excluding individuals from a right, benefit or contract)

☐ Other (general concept in Article 27.1)

17/ COMMENTS

N/A

PLACE AND DATE: BRUSSELS, 16/04/2014

DATA PROTECTION OFFICER: MS. CARINE CLAEYS

INSTITUTION OR BODY: EUROPEAN EXTERNAL ACTION SERVICE (EEAS)