

(To be filled out in the EDPS' office)

REGISTER NUMBER: 1078

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 28/06/2013

CASE NUMBER: 2013-0765

INSTITUTION: EDA

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

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

IGNACIO JESUS SAN MILLAN MAESO
HEAD OF THE EDA SECURITY UNIT
RUE DE DRAPIERS 17-23
1050-IXELLES, BRUSSELS (BELGIUM)

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

All EDA entities (Directorates and Units) at different levels and access rights; Only for purpose 5 (see point 4 of this notification) and just for collecting and processing.
For the rest of purposes, only the Security Unit is the processor.

3/ NAME OF THE PROCESSING

ACCESS CONTROL TO EDA PREMISES

4/ PURPOSE OR PURPOSES OF THE PROCESSING

This set of processing operations serve several related purposes:

1. To control visitors' identity and needs to enter EDA premises.
2. To manage the badges for EDA Staff and some special visitors (National POCs and contractors' personnel), to allow access to certain areas.
3. To control access of individuals with vehicles.

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

4. Manage the SALTO locks' keys to certain rooms.
5. To manage and control EDA briefing rooms and meetings held therein.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

1. EDA Staff (Temporary Agents, Contractual Agents and Seconded National Experts (SNE), and other Staff working permanently in the Agency (interns, seconded other than SNE, contractors, etc).
2. EDA temporary contractors' personnel.
3. Delegates and officials from EDA participating Member States (pMS), delegates from Third Countries, Staff from other EU institutions, etc., participating in EDA meetings.
4. Other visitors needing access to EDA premises.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA (*including, if applicable, special categories of data (Article 10) and/or origin of data*).

Name, nationality or international organizations name, ID number and date of birth.

For the management of badges, a photo. Access traces and timing.

For the access with car, the brand of the car and number plate.

Not any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and of data concerning health or sex life, are collected, and therefore processed.

7/ INFORMATION TO BE GIVEN TO DATA SUBJECTS

See attachment

8/ PROCEDURES TO GRANT RIGHTS OF DATA SUBJECTS

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

Data subjects can exercise their rights concerning access, rectification, blocking, erasure and objection of their personnel data to the Data Controller in security@eda.europa.eu or to the address:

HEAD OF THE EDA SECURITY UNIT
RUE DE DRAPPIERS 17-23
1050-IXELLES, BRUSSELS (BELGIUM)

Or to the EDA Data Protection Officer, in the same address as above or by e-mail to dpo@eda.europa.eu.

Data subjects will receive answer within 3 months from the receipt of the request.

9/ AUTOMATED / MANUAL PROCESSING OPERATION

The only automated processing operation is related to the use of badges/especial locks when entering premises or determined areas and offices.

The rest of processing operations are manual.

10/ STORAGE MEDIA OF DATA

All data regarding access is stored in the EDA Data Center or in the EDA access control PCs.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

Article 8, article 13 and Annex II of Council Decision 2011/2921/EU of 31 March 2011 on the security rules for protecting EU classified information.

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

There are not recipients or categories of recipient to whom the data might be disclosed, except if any breach or suspected breach of security occurs. In that case personnel data might be disclosed to the competent security authority, for action (as described in article 13 of the Council Security Rules)

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

- FOR STAFF WORKING PERMANENTLY IN THE AGENCY: UP TO 5 YEARS AFTER TERMINATION OF CONTRACT.
- EDA TEMPORARY CONTRACTORS' PERSONNEL: UP TO 5 YEARS AFTER TERMINATION OF CONTRACT.
- DELEGATES AND OFFICIALS FROM EDA PMS, FROM THIRD COUNTRIES, OTHER EU INSTITUTIONS STAFF, ETC.: UP TO 5 YEARS AFTER THEIR LAST VISIT.

13 A/ TIME LIMIT TO BLOCK/ERASE ON JUSTIFIED LEGITIMATE REQUEST FROM THE DATA SUBJECTS

FOR THE BLOCKING: UP TO 1 MONTH AFTER RECEPTION OF THE REQUEST FROM THE DATA SUBJECT.
FOR THE ERASURE: UP TO 1 MONTH AFTER RECEPTION OF THE REQUEST FROM THE DATA SUBJECT

(Please, specify the time limits for every category, if applicable)

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.

PERSONAL DATA WILL BE BLOCKED AFTER REQUEST FROM THE DATA SUBJECT, WITH THE EXCEPTION OF THEIR STORAGE, EXCLUSIVELY BY THE DATA CONTROLLER. THE PERSONAL DATA ONLY COULD BE PROCESSED FOR PURPOSES OF PROOF, FOR THE PROTECTION OF EUCI, FOR THE EFFECTIVE APPLICATION OF ARTICLE 13 OF THE COUNCIL SECURITY RULES.

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

NOT APPLICABLE.

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

YES

AS FORESEEN IN:

↑ Article 27.2.(a)

Processing of data relating to suspected offences, offences, criminal convictions or security measures, EDA-PCN-12-Access control

17/ COMMENTS

PLACE AND DATE: BRUSSELS, 25 JUNE 2013

DATA PROTECTION OFFICER: ALAIN-PIERRE LOUIS

INSTITUTION OR BODY:EDA