

(To be filled out in the EDPS' office)
REGISTER NUMBER: 1297

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NOTIFICATION FOR PRIOR CHECKING

DATE OF SUBMISSION: 13/02/2015

CASE NUMBER: 2015-0138

INSTITUTION: EEAS

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

INFORMATION TO BE GIVEN²

1/ NAME AND ADDRESS OF THE CONTROLLER

Controller

The Director of the European External Action Service/Crisis Management and Planning Directorate - Mr. Gabor IKLODY (at the time of the Notification), Avenue de Cortenbergh 150, 1046 Brussels, Belgium.

Delegated controller

The Head of Crisis Management and Planning Directorate/ Capabilities, Training and Exercises Division - Mr. Giorgio PORZIO (at the time of the Notification), Avenue de Cortenbergh 115, 1046 Brussels, Belgium.

Processors

The national authorities identified within the Goalkeeper- Registrar system as the Data Providing Authorities (DPAs), which are processing personal data by collecting, processing and using Experts' personal data contained in the roster assigned to them.

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

EEAS – CMPD Crisis Management and Planning Directorate
/Capabilities, Training and Exercises Division A2/

3/ NAME OF THE PROCESSING

Registrar application as part of the Goalkeeper software environment

¹ OJ L 8, 12.01.2001.

² **Please attach all necessary backup documents**

4/ PURPOSE OR PURPOSES OF THE PROCESSING

The aim of this application is to facilitate and expedite the identification and possible deployment of civilian personnel for CSDP missions.

The personal data are collected and retained in order to:

- Enable Data Providing Authorities in the concerned Member State to:
 - Process at any time, via a secure connection to a central server, personal data concerning experts potentially available for civilian crisis management missions under CSDP;
 - Reserve Contact Details of these experts, so as to maintain exclusive control over their release for possible secondment to international missions, while sharing the anonymized statistically relevant data of these experts with pre-identified actors in the EEAS and in the relevant administrations of the concerned Member State;
 - Identify rapidly, upon request by the concerned Member State's competent authorities, candidates for possible secondment to CSDP missions;
- Provide competent authorities in the concerned Member State with the possibility to draw on certain predefined anonymized elements of personal data with a view to establishing relevant detailed statistics concerning the national state of preparedness in the realm of civilian capabilities for international crisis management activities.
- Provide the EEAS with the possibility to draw on certain predefined anonymized elements of personal data with a view to providing the competent Council bodies at any given time with relevant detailed statistics concerning the EU's state of preparedness in the realm of civilian capabilities for CSDP.

Description

Processing of specific personal information through the Expert Registration Form and the Application Form within the Registrar application as part of the Goalkeeper software environment.

The personal data of civilian personnel (the experts) are collected by means of uploading information on-line through the Registrar Expert Registration Form and the Registrar Application Form. The uploading of data is going to be performed voluntarily by the individual experts (data subjects). The application will process data of two categories of experts: independent experts and experts seconded by Member States' national authorities. Data of experts (both independent and seconded) will be processed and managed by the Data Providing Authorities of the Member State in whose rosters the experts are included. EEAS-CPCC will process and manage the data of those independent experts registered in its own roster. Data (name and contact details) of the experts' supervisors for their current and past professional positions, will also be collected through the Expert Registration Forms.

5/ DESCRIPTION OF THE CATEGORY OR CATEGORIES OF DATA SUBJECTS

Processed data belong to two categories of data subjects:

I. Experts

- a. national officers, belonging to Member States' national authorities, who are available to be seconded to civilian crisis management missions under EU CSDP;
- b. independent experts who are registered into Member States' Compartments and EEAS-CPCC Compartment as experts to be contracted on an *ad hoc* basis for civilian crisis management missions under EU CSDP.

II. Experts' supervisors

Data subjects identified by the experts (in their Expert Registration Form) as their supervisors in their current and past job position.

6/ DESCRIPTION OF THE DATA OR CATEGORIES OF DATA

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

I. Data processed with regard to experts are the following:

Personal Details

Given Name, Family name, Gender, Country of birth, Birth date, Nationality/ies, Passport number, Driving licenses, Area of expertise, level of security clearance.

Contact Details

Home country address and alternative/ current contact details.

Education and professional training

University education or equivalent, Secondary education and/or formal vocational education/training, Civilian crisis management courses, Hostile Environment Security Training or e-Hest.

Employment record

Organization, Place and country, Job title, Period of time in that position, Description of tasks and responsibilities, Current/past supervisor's name and contacts (as identified by the experts in their Expert Registration Form).

Levels of knowledge of foreign languages and computer skills

Other data related to:

- Availability for deployment in case of a job offer
- Health status
- Involvement in criminal proceedings

II. Data processed with regard to the supervisors of experts are the following:

Personal Details

Given Name, Family name.

Contact Details

Current contact details including professional e-mail address.

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 available on:

- Goalkeeper-Registrar website (<https://goalkeeper.eeas.europa.eu/registrar>). On all pages of the Registrar application it will be possible to click directly on "Your Privacy Rights" next to the Legal Notice.
- Intranet EEAS Zone (<http://intragate.ec.europa.eu/eeas/eeaszone/?q=ict-catalogue>). As soon as the intranet webpage on the Registrar application will be available, a link will be provided to "Privacy Rights".

As soon as information on the Registrar application will be available on the EEAS website (http://www.eeas.europa.eu/csdp/structures-instruments-agencies/cmpd/index_en.htm and http://www.eeas.europa.eu/csdp/civilian-crisis-management/index_en.htm), a link to "Privacy Rights" in Registrar will be provided.

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 5 working days after the request will have been deemed legitimate. If the data subjects have any queries concerning the processing of their personal data, they may address them to the data controller at the following functional mailbox: goalkeeper-support@eeas.europa.eu

9/ AUTOMATED / MANUAL PROCESSING OPERATION

All the data will be both manually and automated collected and processed.

10/ STORAGE MEDIA OF DATA

The data will be stored on DIGIT data centre and are accessible through the internet using authentication procedures and secure protocols.

11/ LEGAL BASIS AND LAWFULNESS OF THE PROCESSING OPERATION

- Civilian Headline Goal 2010 (approved by the ministerial Civilian Capabilities Improvement Conference and noted by the General Affairs and External Relations Council on 19 November 2007 - doc. 14823/07)
- Multi-annual Civilian Capability Development Plan (EEAS (2012) doc 01186).
Further legal basis:
- 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

- Designated staff in Member States' national authorities that are responsible to identify and authorise the deployment of possible experts for CSDP missions. These national authorities are identified in the Registrar application as Data Providing Authorities. They will process data of both seconded experts (who are officers belonging to Member States' national authorities with seconding powers) and independent experts (who are nationals of the Data Providing Authority's Member State and are registered in rosters of independent experts to be contracted on an ad hoc basis).
- Designated staff in EEAS-CPCC (mission support units) for the identification of possible experts belonging to its own roster of independent experts and the selection of seconded and contracted experts to be deployed to CSDP missions.
- Designated staff in EEAS-CMPD for capability planning and statistical purposes.

13/ RETENTION POLICY OF (CATEGORIES OF) PERSONAL DATA

- Data will be retained until the system will be operational unless a request for deletion of data is filed to the responsible authorities. Deletion of data will be requested by individual experts. For seconded experts, this request will be sent to (and processed by) identified staff in the Data Providing Authority managing the roster in which the expert is registered. For independent experts, the request for deletion will be sent to (and processed by) either the Data Providing Authority managing the roster of independent experts in each Member State, or EEAS-CPCC for those independent experts registered in EEAS-CPCC roster. Requests for deletion are treated within 5 working days after the request has been deemed legitimate.
- After the Registrar application has ceased to be operational, the data will be destroyed after the period of 1 year.
- In case of Expert Registration Forms that have been not updated for 3 years, the system will send to the expert an automated warning message offering the opportunity to the individual expert to either refresh or request the deletion of his/her own data.

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 has 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)

Among the data processed in the Registrar application and provided through the Expert Registration Forms and the Application forms, only anonymised data will be used for statistical purposes by identified staff of EEAS-CMPD.

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

N/A

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,)

Yes, there is collection of data related to health and to involvement in criminal proceedings as well as level of PSC (Personal Security Clearance) in the Expert Registration Form. This information is necessary to assess if the subject is suitable to be deployed in missions (which are often carried out in hostile environment) or if he/she complies with specific recruitment requests that might be formulated in the Job Description.

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
NA

PLACE AND DATE: BRUSSELS, 12/02/2015

DATA PROTECTION OFFICER: MS. CARINE CLAEYS, DEPUTY HEAD OF DIVISION

INSTITUTION OR BODY: EEAS – EUROPEAN EXTERNAL ACTION SERVICE