

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO EEAS SECURITY E-LEARNING TRAININGS 'BASE' AND 'SAFE'

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS), including the Delegations of the European Union. You have the right under EU law to be informed when your personal data is processed [e.g. collected, used, stored] as well as about the purpose and details of that processing.

When handling personal data, we respect the principles of the Charter of Fundamental Rights of the European Union, and in particular Article 8 on data protection. Your personal data are processed in accordance with Regulation (EU) 2018/1725 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, aligned with Regulation (EU) 2016/679, the General Data Protection Regulation. In this privacy statement you find information about how the EEAS and EU Delegations process your personal data and what rights you have as a data subject.

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

The purpose of the present processing activity is to implement EEAS Security e-learning trainings of 'BASE' and 'SAFE'. The EEAS security e-learnings platform contains compulsory security e-learning courses for staff posted in EU Delegations and for staff at Headquarters. The personal information is collected to verify compliance with the instruction to complete the courses. Personal data, including names, e-mail addresses and assignments of those who enrol for the security e-learning courses BASE and SAFE will be processed and retained in the system. The system also retains data about the degree of completion of each user.

3. DATA PROCESSED: What data do we process?

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

- First Name
- Surname
- Email address
- Location at registration (country)
- Organisation at registration
- Status:
 - Official, Contract or Temporary Agent
 - Seconded National Expert
 - Local Agent
 - Junior Professional in Delegation
 - Trainee
 - Family member
 - EU Aid Volunteer
 - Other
- Country to be deployed to (if not yet in post)
- Justification for the validation of an enrolment request by external users

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

The data controller determining the purpose and the means of the processing activity is the European External Action Service. The EEAS Division entrusted with managing the personal data processing under the supervision of the Head of Division is:

'Field Security' Division, EEAS.RM.SECRE.1

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

I. Assigned staff in EEAS Headquarters

Access to the data contained in the EEAS security e-learnings platform is limited to a small number of staff members at HQ on a strict need-to-know basis. These are designated staff members in the Field Security Division and in the IT Division for technical support. Other staff members can receive data only as extracted reports by one of the aforementioned administrators of the application that have access to the database. The recipients of the reports are limited to staff with a security or management function.

Headquarters: Heads of Division and above receive lists of their staff only.

II. Assigned staff In EU Delegations

Regional Security Officers receive the list of all users that have completed the e-learning courses BASE or SAFE for the purpose of verifying the completion rate in their Delegations. The other Delegations' Security Management Team members (the Head of Delegation, the Delegation Security Coordinator, the Head of Administration and, where applicable, other members) receive the list of their own Delegation staff only.

ICF International in Brussels, managing the EU Aid Volunteers program, receives on request the list of their EU Aid volunteers that completed a course. If a Member States administration uses BASE and SAFE for their staff, on request the list of their staff members that have completed a course will be transmitted to them by the Field Security Division.

Personal data is not intended to be transferred to a third country or an international organisation, except where necessary for providing access to recipients as described above. In case of international transfers appropriate safeguards are ensured in accordance with Chapter V of Regulation (EU) 2018/1725. The given information will not be communicated to third parties, except where necessary for the purposes outlined above.

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

You have the right of access to your personal data and the right to correct your inaccurate, or incomplete personal data taking into account the purpose of the processing. The right of rectification can only apply to factual data processed. Under certain conditions, you have the right to ask the deletion of your personal data or restrict their use as well as to object at any time to the processing of your personal data on grounds relating to your particular situation. We will consider your request, take a decision and communicate it to you without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary. For more detailed legal references, you can find information in Articles 14 to 21, 23 and 24 of Regulation (EU) 2018/1725. In specific cases, restrictions under Article 25 of the Regulation may apply. If you wish to exercise your rights or have questions concerning the processing of your personal data, you may address them to the Data Controller via the functional mailbox:

RM-SECRE-1@eeas.europa.eu

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

Lawfulness

The processing of your personal data is necessary for the performance of a task carried out by the EEAS in the public interest, in particular for the management and functioning of the EEAS [Article 5(1)(a) of Regulation (EU) 1725/2018] as referred to in Recital 22 thereof.

Legal reference

- [Decision of the High Representative of the Union for Foreign Affairs and Security Policy of 19 September 2017 on the security rules for the European External Action Service, and in particular art. 1, 7, 9 and 10 \(OJ C 2018 126/1\)](#)
- [Council Decision of 26 July 2010 establishing the organisation and functioning of the EEAS \(2010/427/EU\) – OJ L 201, 3/8/2010, p. 30](#)
- [Code of Good Administrative Behaviour](#)

8. TIME LIMIT FOR DATA STORED & SECURITY MEASURES: For what period and how we process your data?

Retention of data

Personal data is kept within the online platform until the date of termination of the platform. Once the operation of the platform is terminated, any data at a central server level will also be destroyed by the EEAS, after one year.

Security of data

Appropriate organisational and technical measures are ensured according to Article 33 of Reg. (EU) 2018/1725. The collected personal data are stored on servers that abide by pertinent security rules. Data is processed by assigned staff members. Access to specific files requires authorisation. Measures are provided to prevent unauthorised entities from access, alteration, deletion, disclosure of data. General access to personal data is only possible to recipients with a UserID/Password. Physical copies of personal data are stored in a properly secured manner.

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

If you have enquiries you can also contact the EEAS Data Protection Officer at data-protection@eeas.europa.eu.

10. RECOURSE

You have, at any time, the right to have recourse to the European Data Protection Supervisor at edps@edps.europa.eu.