



## **Data Protection Notice for Managing HADEA Staff Missions**

The European Health and Digital Executive Agency (HaDEA) processes your personal data<sup>1</sup> in line with [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council of 23 October 2018<sup>2</sup>](#) on the protection of personal data by the European Union's institutions, bodies and agencies and on the free movement of such data.

### **What is the purpose of this processing activity?**

The purpose of this processing operation is to allow the organization of travel, the accommodation of HADEA staff during missions and the payment of the resulting costs. To ensure the most cost-effective management of the missions of its staff, the HADEA relies on external service providers. The mission management activity is broken down into a number of internal operations and other operations that are performed by selected contractors or their external service providers.

These contractors are:

- the travel agency responsible for issuing tickets, making hotel / car reservations;
- the organization responsible for issuing corporate credit cards; and
- the insurance / assistance company in charge of covering in a complementary way the head of mission in the event of illness / accident, or any other risk defined by the police on missions.

External service providers can be:

- car rental companies used for missions;
- transport companies (airlines, railways, taxi, etc);
- hotels, and / or other "assimilated" accommodation options (bed and breakfast, apart-hotel); and
- any other body that may be called upon to intervene by the specificity of the mission.

### **Who is the data controller?**

The data controller of the processing operation is the Head of Unit C.3 Staff, Communication and Support of HaDEA.

The following entities process personal data on behalf of HaDEA as processors:

- The Office for the Administration and Payment of Individual Entitlements (PMO)

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<sup>1</sup> **Personal data** shall mean any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

<sup>2</sup> 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 (OJ L295/39 of 21.11.2018).

of the European Commission<sup>3</sup>, Avenue de Tervueren 41, 1049 Brussel, Belgium.

- The travel agency American Express Global Business Travel (GBT), Alma Court Lenneke Marelaan 6, 1932 Sint Stevens Woluwe, Belgium. Its Privacy policy is available at <https://privacy.amexgbt.com/statement>.
- The organization responsible for issuing corporate credit cards Lufthansa AirPlus Servicekarten GmbH, Dornhofstr. 10, 63263, Neu-Isenburg, Germany. Its Privacy statement is available at <https://www.airplus.com/editorial-files/common-media/documents/product-privacy-statements/english/airplus-privacy-statement-corporate-card-with-private-liability-europe-en.pdf>.
- The insurance company CIGNA International Health Services, OPS-GP (04), Postbox 69, 2140 Antwerpen (Belgium). Its Privacy statement is available at <https://www.cignahealthbenefits.com/en/privacy>.

and as subprocessors, when the reservation is made by the travel agency:

- car rental companies used for missions;
- transport companies (airlines, railways, taxi, etc);
- hotels, and / or other "assimilated" accommodation options (bed and breakfast, apart-hotel); and
- any other body that may be called upon to intervene by the specificity of the mission.

### **Which personal data is collected?**

The following of your personal data are **mandatory** to collect for the purposes outlined above: title, surname, first name, date of birth, login, personnel number, ID or passport number, assignment, place of assignment, office address, business telephone number, professional email address, credit card number, place(s) of mission and transit, estimated time of departure and return to the place of assignment, means of transport used, name of the hotel, invoice(s), start and end times of the professional engagements at the mission site, agent's bank account number, MIPS mission number and confirmation number generated at the moment of signature for approval by the authorising officer.

Other **non-mandatory** personal data may be provided in certain circumstances by persons going on mission/authorised travel, if they wish to receive more personalised service, including for example: a mobile telephone number; their nationality; date and place of issue of their ID or passport and its expiry date; details of a person who may be asked to make reservations on their behalf; any preferences as regards the conditions of the trip such as seat or meal.

### **Who has access to the personal data of data subjects and to whom can they be disclosed?**

Within HADEA organisation the recipients of your personal data will be:

- Line managers;

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<sup>3</sup> See Commission Decision of 6 November 2002 establishing the Office for the Administration and Payment of Individual Entitlements C(2002)4367.

- Mission correspondents;
- Mission Manager (Gestionnaire de Missions – GEMI)
- Authorized staff of the financial Unit C2 involved in the financial processing of payments linked to the mission.

Outside HADEA organization the recipients of your personal data will be:

- The service providers involved in the management and execution of a mission, namely: the travel agency, the insurance company, the hotels, the credit card issuing transportation (plane, train, etc.), car rental companies and others.
- The PMO Unit in charge of missions and related IT systems.
- On a need-to-know basis and in compliance with the relevant current legislation, bodies charged with monitoring or inspection tasks in application of EU law (e.g. EC internal audit, Court of Auditors (ECA), European Anti-fraud Office (OLAF), the European Ombudsman, the European Data Protection Supervisor (EDPS), Internal Audit Service of the European Commission (IAS), the European Public Prosecutor).

In some cases your personal data may be transferred to a third country. Indeed, the travel agency or you may have to transmit data concerning the staff member on mission/ authorised travel to a country outside the EU. This transfer is based either on Articles 47 (adequacy decision) or 48 (appropriate safeguards) of Regulation (EC) No 2018/1725. Such appropriate safeguards shall consist of binding corporate rules, codes of conduct or certification mechanisms pursuant to points (b), (e) and (f) of Article 46(2) of Regulation (EU) 2016/679.

The processing of your data will **not include automated decision-making** (such as profiling).

The processing of your data will **include** the use of specific IT tools such as [MiPS](#) (Missions Processing System, used to create a mission order before your departure and to declare your expenses after your return), [NEO](#) (Online Booking Tool) and ABAC (Accrual Based Accounting, used for processing payments of mission costs).

### **Which is the legal basis for processing your personal data?**

The legal basis for the processing activities is Article 5(1)(a), (b) and (d) of Regulation EU 2018/1725 because:

- (a) processing is necessary for the performance of a task carried out in the public interest (or in the exercise of official authority vested in the Union institution or body)<sup>4</sup>;
- (b) processing is necessary for compliance with the legal obligation to which the controller is subject as established by the Commission Decision C(2017) 5323 of 27.09.2017 on the general provisions for implementing Articles 11, 12 and 13 of Annex VII to the Staff Regulations of Officials (mission expenses) and on authorised travel; and
- (c) you have given your consent for the processing of the abovementioned non-mandatory personal data.

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<sup>4</sup> Act of Establishment: Commission Implementing Decision (EU) 2021/173 of 12 February 2021 establishing the European Health and Digital Executive Agency.

### **How to withdraw your consent and the consequences of doing this**

If you want us to delete the above-mentioned non-mandatory personal data, please contact us and we will do it at the latest within 15 working days after your request.

Please note that withdrawing your consent does not affect the lawfulness of any processing based on your consent before this consent is withdrawn. Attention is drawn to the consequences of a delete request, which means that all your contact details will be lost.

### **How long do we keep your personal data?**

Your personal data will be kept for a maximum period of 7 years after the end of the event mission. Data will be deleted at the end of this period.

### **What are your rights regarding your personal data?**

You have the right to access your personal data and to request your personal data to be rectified, if the data is inaccurate or incomplete; where applicable, you have the right to request restriction or to object to processing, to request a copy or erasure of your personal data held by the data controller. If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

Data subjects may also change/rectify/withdraw themselves through MIPS certain data of their mission order.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**.

### **Contact Information**

If you have **any queries** concerning the processing of your personal data or wish to exercise any of the rights described above, you can contact: [HADEA-MISSIONS@ec.europa.eu](mailto:HADEA-MISSIONS@ec.europa.eu) and HaDEA DPO [HADEA-DPO@ec.europa.eu](mailto:HADEA-DPO@ec.europa.eu)

**You shall have right** of recourse at any time to the European Data Protection Supervisor at [EDPS@edps.europa.eu](mailto:EDPS@edps.europa.eu).