



Data Protection Notice for HaDEA promotional materials featuring staff

The European Health and Digital Executive Agency (HaDEA) processes your personal data¹ in line with [Regulation \(EU\) 2018/1725 of the European Parliament and of the Council of 23 October 2018](#)² 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?

Personal data is processed in the context of the production of HaDEA promotional materials such as posters, roll-ups or brochures, which can feature the names, functions, photographs and sometimes quotes of personal opinions of HaDEA staff on specific topics, in order to carry out promotional campaigns to illustrate, promote and to give visibility to the Agency's activities (including programmes implementation), its objectives and its achievements.

Who is the data controller?

The **data controller** of the processing operation is Head of Unit C.3 of the European Health and Digital Executive Agency (HaDEA).

Contractors may be hired for ad hoc activities with the task to take pictures or produce the communication material (such as photographers, graphic designers, printers) who will act as processors of your personal data on behalf of HaDEA.

Which personal data is collected?

The following non mandatory personal data will be collected from you and processed: first name, last name, function, photograph, personal opinion on a specific topic

Your consent to process your personal data will be collected via an explicit response to an email sent to you in the context of calls for expression of interest asking to participate to specific promotional initiatives and asking to contribute to it by allowing the publication of your personal data (such as name, photo and other personal details) on communication and promotional material.

¹ **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.

² 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).

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

The promotional material containing your personal data will be published in one or more of the following areas, depending on the product:

- COV2 building corridors (HaDEA floors) and lobby
- HaDEA intranet
- HaDEA website
- HaDEA events on COV2 premises
- HaDEA events on external premises

The recipients of your personal data will be:

- authorised staff members of HaDEA communication sector, C.3.002;
- staff members of EU institutions and public accessing COV 2 building and floors/offices where the promotional material is displayed;
- Public and EU institution staff members having access to HaDEA website and to HaDEA intranet;
- Public and staff of EU institutions having access at HaDEA external events on external premises where the promotional material is used.

Your personal data **will not be transferred** to third countries or international organisations.

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

Which is the legal basis for processing your personal data?

The legal basis for the processing activities is:

- Article 5(1)(d) of Regulation EU 2018/1725 because you have given your explicit consent to the processing of your non mandatory personal data indicated above.

How to withdraw your consent and the consequences of doing this

If you want to withdraw your consent and request to remove your personal data from HaDEA promotional materials, please contact us and we will do it at the latest within 10 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 your data including photograph will be lost.

How long do we keep your personal data?

Personal data will appear on the promotional materials (poster, roll-up, brochures) for as long as they remain in promotional use; after the end of the promotional campaign the material will be removed; if your consent is withdrawn your personal data will be removed from the promotional material.

All photographs will be stored in a dedicated folder on the shared drive of the HADEA local network. Only authorised staff members of the HADEA communication sector can access to the dedicated folder. The above-mentioned files will not be saved or stored in any other locations or media. Data will be deleted after 1 year.

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..

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

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 the Head of Unit C.3 (entity acting as data controller) via HaDEA-COMMUNICATION@ec.europa.eu and HaDEA DPO 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.