



EMA/186487/2019

Record of data processing activity relating to personal files (public)

1.	Last update of this record, version number:	11 March 2024, version 3
2.	Reference number:	A1
3.	Name and contact details of controller:	European Medicines Agency Internally: Head of Administration and Corporate Management Division datacontroller.administration@ema.europa.eu
4.	Name and contact details of DPO:	dataprotection@ema.europa.eu
5.	Name and contact details of joint controller (where applicable)	Not applicable
6.	Name and contact details of processor (where applicable)	Eurostat for pension data: ESTAT-PENSION-SECTOR@ec.europa.eu OASIS (Offsite Archive Storage and Integrated Services)(for the paper personal file from before the migration to Opentext) swright@grcilaw.com SAP Belgium – Luxembourg for European Institutions and NATO: SuccessFactors modules and OpenText (i.e. for the digital personal file): privacy@sap.com ServiceNow Nederland B.V. (as part of the European Commission HR Transformation (HRT) Programme: privacy@servicenow.com Microsoft cloud services (Azure and Power BI)
7.	Purpose of the processing	Processing of personal data is necessary for the recruitment and for the establishment of their grading, rights and allowances.



8.	Description of categories of persons whose data EMA processes and list of data categories	<p>The following categories of data subjects are subject to this processing operation:</p> <ul style="list-style-type: none"> • Temporary Agents • Contract Agents • Seconded National Experts • Trainees • Interims <p>The following categories of personal data are collected for this processing operation:</p> <ul style="list-style-type: none"> • First name • Surname • Date of Birth • Gender • Current home address • Contact details • Nationality • Languages spoken • Education • Career details (skills, professional experience, working time) • Social Security and Pensions information • Bank account details • Leave requests • Information about pay and allowances • Personal information about dependents/family members <p>The above personal data is collected directly from the individual it relates to and not by third parties, such as previous employers, EU databases, enforcement agencies and open sources (e.g. LinkedIn, Twitter, etc.).</p>
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9.	Time limit for keeping the data	The European Commission's " <i>Liste commune de conservation des dossiers au niveau de la Commission européenne</i> " SEC(2007)970/1 states that personal files are kept for up to 8 years after the extinction of all rights of the person concerned and of any dependants, but until at least 120 years after the date of birth of the interested party.	
		For allowances	5 years after annual Budget discharge
		Salary working files (i.e. monthly payments, calculations and instructions for payment)	Scanned version: one year after leaving (Note: personal files no longer scanned) Paper version: after staff member is deceased and pension payments to dependents end
		Salary personal files (i.e. documents for Commission on verification of salary payments, entitlement table)	Scanned version: one year after leaving (Note: personal files no longer scanned) Paper version: after staff member is deceased and pension payments to dependents end
		National experts and Trainees and Interims (payment working files)	5 years after annual Budget discharge
		Police certificate/criminal record or similar documents on Personal files (AT/CA/SNE)	Removed from personal file 2 years following recruitment and destroyed confidentially in line with the EDPS recommendations (ref. 2011-0842 D-542)
10.	Recipients of the data	Organisational entity at EMA responsible for the onboarding Verifying Officer Authorising officer Court of Auditors According Article 26 of the Staff Regulations the personal file shall be forwarded to the Court of Justice of the European Union if an action concerning the staff member is brought.	
11.	Are there any transfers of personal data to third countries or international organisations	Not applicable	
12.	General description of security measures, where possible.	The Agency has appropriate technical and organisational measures in place, including organisational policies, to safeguard the security of personal data and ensure the confidentiality, integrity and availability of the relevant systems, services and the personal data processed within them. In particular, <ul style="list-style-type: none"> Paper copies are stored in locked cabinets. Keys kept in safe and the code of safe is only available to Personnel 	

		<p>Staff;</p> <ul style="list-style-type: none"> • Electronic copies can be accessed only through PC password; • According to Article 26 of the Staff Regulations the personal file is kept confidential and consulted only in the offices of the administration or on a secure electronic medium.
13.	For more information, including how to exercise your rights to access, rectification, object and data portability (where applicable), see the privacy statement:	<p>Details concerning the processing of your personal data are available on the Agency's website at: https://www.ema.europa.eu/en/about-us/legal/general-privacy-statement, where you may find the EMA General Privacy Statement as well as the privacy statements on specific data processing operations."</p>