

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF PROCESSING PERSONAL DATA RELATED TO REQUESTING ACCESS VIA THE “EEAS WELCOME” APPLICATION TO IT SYSTEMS OF THE EEAS FOR EXTERNAL USERS

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?

We process personal data to determine the eligibility of external users to request access to designated EEAS applications, with the objective of maintaining the security and integrity of our systems. The data is solely processed for pre-authorisation requests (subject to the approval of the relevant EEAS service) submitted via “EEAS Welcome”, as well as for audit purposes, in accordance with applicable data protection laws and organisational security policies.

Description

When an external user (without prior access) tries to connect to an EEAS application (“accessed application”) for the first time, the user is prompted to request access through the “EEAS Welcome” application, after successful authentication via EU Login. Name, Surname and e-mail address of the user in the EEAS Welcome access request page are automatically fetched from the respective EU Login data and are not editable in EEAS Welcome. Before submitting the access request, the external user will have to acknowledge that the EEAS Welcome privacy statement has been read.

Once the access request via EEAS Welcome will be approved, the user will be redirected to the EEAS application (“accessed application”), at which stage additional data might be required by the accessed IT system. These additional data are processed in the accessed application, which will have its own privacy statement.

If the access is rejected by the relevant EEAS Service, the external user will not be able to request access again using the same EU Login account. The user may request to review and receive further information on the rejection decision by reaching out to their EEAS contact point. The EEAS relevant service, together with Digital solution Division will do their utmost possible to provide further information to the extent allowed by the EEAS Security Policy.

3. DATA PROCESSED: What data do we process?

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

Identification data

- Name
- Family name
- Email address
- EULogin username

Technical data

- System to which access is requested
- Access granted or rejected
- Data about access to the system (event logs, such as date and time of access request, number of attempts, etc.)

The identification data is directly sourced from the European Commission authentication mechanism, EU Login.

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 (EEAS). The EEAS Division entrusted with managing the personal data processing under the supervision of the Head of Division is the following organisational entity:

RM.SCS.5 – Digital Solutions

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

The recipients of your data may be

- EEAS assigned staff responsible for carrying out this processing activity
- technical staff handling EEAS Welcome and the accessed application
- other authorised staff supervising or controlling the processing activity according to the “need to know” principle, including the business owner of the accessed application

Personal data is not shared with other recipients except to the extent and for the purpose we may be required to do so by law and will not be transferred to third countries or international organisations.

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.

You can exercise your right to rectify inaccurate or incomplete identification data by turning directly to DG DIGIT of the European Commission, managing its authentication mechanism, EULogin. Any corrections or updates to your personal information must be made within your EULogin, for which the [EU Login Privacy Statement](#) applies. Any update in the EU Login data that EEAS Welcome consumes, will be processed in EEAS Welcome upon the following log-in to the accessed application. If you have questions concerning the processing of your personal data or if you wish to exercise your rights related to the processing of your data in EEAS Welcome (authorisation and logging data), you may address them to the Data Controller via the functional mailbox: you may address them to the Data Controller via the functional mailbox:

RM-SCS-5@eeas.europa.eu

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

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

The processing of your personal data is also necessary for compliance of the EEAS to ensure security of its information systems [Article 5(1)(b) of Regulation (EU) 2018/1725].

Legal reference:

- Decision of the High Representative of the Union for Foreign Affairs and Security Policy of 19 June 2023 on the security rules for the European External Action Service 2023/C 263/04
- Decision of the High Representative of the Union for Foreign Affairs and Security Policy of 19/06/2023 on the security rules for the European External Action Service [ADMIN\(2023\) 18](#)
- Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission, applied by analogy

Further legal reference:

[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.

8. TIME LIMIT & DATA SECURITY: for what period and how securely do we process your data?

Storage period

- In case access to the designated EEAS application has been approved, personal data in EEAS Welcome are retained for the duration of the user's access to the designated EEAS application.
- If/when access to the application is removed, EEAS Welcome will further store the personal data for a period of 12 months
- In case access to the designated EEAS application has been rejected, EEAS Welcome will store personal data for a period of 12 months.
- In case of deletion of the EU Login account, EEAS Welcome will store personal data for a period of 12 months. Personal data may be kept for information and historical, statistical or scientific purposes for a longer period of time. Archiving shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of individuals. Reports and other material containing personal data are archived according to e-Domec policy.
- In case of an incident, event or enquiry by authorities, data subjects or other concerned individuals' personal data will be preserved as long as the legal claims arising from the investigations expire or any follow-up action is due. This includes pending cases, appeals and court judgments to allow for the exhaustion of all appeal and other channels of legal remedies. In any case, personal data will not be kept longer than 5 years after the judgment on the pending case is final or 2 years following an ombudsman case where there is no follow-up.

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.

Specific security measures: A two-factor authentication via EU Login is required to be able to submit an access request via EEAS Welcome.

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.