

EEAS PRIVACY STATEMENT - DATA PROTECTION NOTICE

FOR THE PURPOSE OF

PROCESSING PERSONAL DATA OF CIVILIAN MISSION MEMBERS RELATED TO THE COVID-19 PANDEMIC BY THE CORONA TASK FORCE OF THE CIVILIAN PLANNING AND CONDUCT CAPABILITY DIRECTORATE OF THE EEAS

1. INTRODUCTION

The protection of your personal data and privacy is of great importance to the European External Action Service (EEAS) and its Directorate of Civilian Planning and Conduct Capability (CPCC) more than ever in this extraordinary situation linked to the COVID-19 emergency. We would like to reassure you of our commitment to respecting your rights regarding personal data collected and processed relating to the coronavirus pandemic. You have the right under EU law to be informed when your personal data is processed [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 by the Corona Task Force of the CPCC/EEAS, 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 the Corona Task Force of CPCC processes the personal data of Members of Civilian Crises Management Missions (your data) linked to the COVID-19 pandemic and what rights you have as a data subject. To be added that the EEAS has documented the various data processing activities that are related to the COVID-19 emergency context for the EEAS and the Union Delegations and the Privacy Statement describing the handling of personal data are available on the website of the EEAS. Your data will not be handled for all of the processing activities listed in this privacy statement. Under Point 2 you will find various purposes related to the COVID-19 emergency context. Please note that most of these data processing activities do apply under standard circumstances as well, nonetheless some additional personal data may be processed for specific and explicit purposes outlined below.

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

The overall objective of the processing activities covered by this Privacy Statement is to ensure that the duty of care is properly discharged in all Civilian Crises Management Missions, and to uphold that Missions Members (MMs) are safe and accounted for.

Health data refers to personal data that relates to the health status of a person. This includes both medical data (doctor referrals and prescriptions, medical examination reports, laboratory tests, radiographs, etc.), but also administrative and financial information about health (the scheduling of medical appointments, invoices for healthcare services and medical certificates for sick leave management, etc.). Your detailed medical data is only collected and processed by the CPCC Corona Task Force members, i.e. by a CPCC Medical Adviser/Coordinator who is bound by medical confidentiality.

The CPCC Corona Task Force (CTF) was set up by the Civilian Operations Commander (CivOpsCdr)/Director of the CPCC to collect and assess information on general Covid-19 developments, advise CPCC's management and provide guidance to CSDP Missions. Whilst handling individual requests from Missions, your personal data may be processed to allow the CTF to make recommendations to Missions about medical evacuation, relocation, return, departure/end of tour of duty/contracts of MMs. These requests particularly concern MMs with higher exposure to COVID-19 virus due to their health conditions. The personal data of the person concerned is included in the request sent by the Mission. The request is discussed by the CTF where the personal data and health status may be invoked.

Where the standard procedures of the EEAS apply and no additional data is collected or processed, the documentation recording the data processing activities and their linked Privacy Statement of the EEAS on the COVID-19 emergency context are fully relevant and pertain.

Requests related to COVID-19 crises situation is sent to the dedicated functional mailboxes of the CFT:

- **CPCC-CORONA-RESPONSE-GROUP@eeas.europe.eu**

3. DATA PROCESSED: What data do we process?

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

- Identification (name, category of staff, nationality, age, place of origin, family status)
 - Mission Members (seconded and contracted) of CSDP Missions
 - Selected candidates (seconded and contracted) for position in CSDP Missions
- Health related data in relation to COVID-19 pandemic situation (contamination) and in particular data on the status of vulnerability (medical data about health conditions are not revealed)
- Date of deployment, date of relocations, date of withdrawal, start end end date of the tour of duty/contract, travel history
- Specific up-to-date information and additional data may be processed,

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.

European External Action Service (EEAS) Civilian Planning and Conduct Capability Directorate CPCC Corona Task Force (CTF)

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

The recipients of your data the Members of the Corona Task Force:

- CPCC Medical Adviser/coordinator, substituted and assisted occasionally by Medical Advisors of CSDP Missions;
- Dedicated staff members of the Security and Duty of Care Office reporting to the CivOpsCdr;
- Dedicated staff members of the Chief of Staff covering legal affairs, strategic communications and lessons learned (CPCC.2);
- Dedicated staff members of the Missions Personnel Division (CPCC.3) covering Human resource policy;
- Dedicated staff members of the Missions Support Division (CPCC.4) covering logistics and finance;
- Dedicated staff memberst of the Conduct of Operations Division (CPCC.1) covering operational aspects .

▪ **Access is on a need-to-know basis.**

The given information will not be communicated to third parties, except seconding authorities and embassies.

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

You have the right of access to your personal data and the right to correct any inaccurate or incomplete personal data. 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. 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 would like 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:

CPCC-CORONA-RESPONSE-GROUP@eeas.europa.eu

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

- Data, including health-related information is processed pursuant to Article 10.2 (b),(c), (g), (h) and, in particular to (i) public interest in the area of public health, as well as to Art. 10.3, in addition to Art. 5.1 (a) necessity for the public interest in the exercise of duty of care and (e) vital interest of individuals)
- 2010/427/EU Council Decision of 26/07/2010 establishing the organisation and functioning of the European External Action Service (OJ L 201)
- Council Decisions establishing the respective Civilian CSDP Missions
- Regulation No 31 (EEC), 11 (EAEC), laying down the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Economic Community and the European Atomic Energy Community(OJ 45, 14.6.1962, p. 1385)

8. TIME LIMIT - DATA STORING: For what period and how we process your data?

Data, including health related information, collected in the context of the COVID-19 emergency situation is intended to be kept not longer than necessary for that specific purpose. Data should accordingly be retained only as long as the crisis situation related to the pandemic is upheld with a subsequent technical retention until deletion, destruction or anonymisation of data could be implemented, foreseen within a maximum period of 12 months. Data will only be kept beyond the emergency context in an anonymised form for statistical purposes.

Security of data

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

Specific access limitation with regard to special categories of data:

General access to special categories of data (health related) data is granted only to the Medical Service. Other assigned staff members have access to certain data only on a need-to-know basis (in particular as part of managing the functional mailboxes for the Covid-19 emergency. Access to the functional mailboxes (CPCC-CORONA-RESPONSE-GROUP@eeas.europa.eu) is restricted.

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

If you have enquiries the CPCC Data Protection Coordinator is at your disposal: CPCC-DIR-CIVOPSCDR@eeas.europa.eu

You can also contact 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.