



07 June 2022
EMA/519784/2019

European Medicines Agency's Data Protection Notice Use of personal data as part of the Emergency Mass Notification System

This Data Protection Notice explains the most essential details of how personal data is processed by the European Medicines Agency (hereinafter "EMA" or "Agency") in the context of the Emergency Mass Notification System (EMNS). This includes the use of personal mobile phone numbers and/or personal e-mail addresses to ensure staff members can be notified at any time in case of emergency situations in and around the Agency.

1. Who is responsible for your data?

1.1. Who is the data controller?

EMA is ultimately responsible to comply with the data protection rights and freedoms of staff and committee members. On behalf of the Agency, the Head of Administration and Corporate Management Division is appointed as a 'Internal Data Controller' to ensure the lawful conduct of this processing operation.

The contact details of the Internal Data Controller are the following:

datacontroller.administration@ema.europa.eu

1.2. Who is the data processor?

The Agency may engage third parties to process data on behalf of the Agency and, in particular, to carry out the following activity: to provide an emergency notification system. Our current system is provided by F24 AG.

The contact details of the data processor(s) are the following: dataprotection@f24.com;
<https://fact24.com/en/privacy-policy>

2. Purpose of this data processing

This data processing activity aims to ensure staff and committee members can be notified at any time in case of emergencies.



2.1. Personal Data concerned

In this processing operation we process one or more data directly collected from you when you start your new position at the EMA, or later during the performance of your service. Such data include the following:

- Your personal mobile phone number
- Your personal e-mail address
- Your work e-mail address
- Your work telephone number / work mobile number

2.2. Legal Basis

In accordance with Art. 55(1) of the Staff Regulations¹, staff members in active employment shall at all times be at the disposal of the Agency. To ensure that in case of an emergency, staff can be notified at any time, staff members can, on a voluntary basis, provide and maintain one or more of their personal contact details (i.e., private mobile phone number and private e-mail address) using the SAP HR self-service. By doing so, staff members consent that the Agency uses the provided contact details for the purpose of such emergency notifications.

The legal basis for the processing of the provided data is therefore Art 5(1)(d) of Regulation (EU) 2018/1725, i.e., "the data subject has given consent to the processing of his or her personal data for one or more specific purposes".

Staff and committee members may withdraw their consent to the processing by either ticking the corresponding box in SAP HR, by simply not providing their details or delegates by contacting the Meeting Secretariat Office. In their response, staff and committee members should state which personal data they want to exclude and the applicable processing activity. Staff members also have the right to withdraw their consent later at any time. It should be noted that such withdrawal does not affect the lawfulness of processing carried out by the EMA before the withdrawal of the consent by a staff member.

3. How long do we keep your data?

The contact details are retained and processed until withdrawal of consent or as long as the staff member is under employment. The contact details will be deleted within six months following the staff member's departure.

4. Who has access to your information and to whom is it disclosed?

The data collected will be processed internally by the business continuity coordinators in the respective division and the Internal Data Controller.

¹ 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

5. Your data protection rights

As data subject (i.e., the individual whose personal data is processed), you have a number of rights:

- **Right to be informed** – This Data Protection Notice provides information on how EMA collects and uses your personal data.
- **Right to access** – You have the right to access your personal data. You have the right to request and obtain a copy of the personal data processed by EMA.
- **Right to rectification** – You have the right to obtain - without undue delay - the rectification or completion of your personal if it is incorrect or incomplete.
- **Right to withdraw consent** – You have the right to withdraw your consent to the processing of your personal data. However, this will not affect the lawfulness of any processing carried out before consent is withdrawn.
- **Right to erasure** – You have the right to require EMA to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. In certain cases, your data may be kept to the extent it is necessary, for example, to comply with a legal obligation of the Agency or if it is necessary for reasons of public interest in the area of public health.
- **Right to restrict processing** – In a few, codified cases, you have the right to obtain the restriction of the processing, meaning that your data will only be stored, but not actively processed for a limited period of time. For more information about this right and its limitations, see the EMA General Data Protection Notice, hosted at www.ema.europa.eu/en/about-us/legal/privacy-statement.
- **Right to portability** - Where the processing is carried out in automated means you have the right to receive your personal data (which was provided to the EMA directly by you) in a machine-readable format. You may also ask the EMA to directly transfer such data to another controller.

The rights of the data subject can be exercised in accordance with the provisions of Regulation (EU) 2018/1725. For anything that is not specifically provided for in this Data Protection Notice, please refer to the contents of the general EMA Data Protection Notice: www.ema.europa.eu/en/about-us/legal/privacy-statement

6. Recourse

In case you have any questions regarding the processing of your personal data, or you think that the processing is unlawful or it is not in compliance with this Data Protection Notice or the general EMA Data Protection Notice, please contact the **Data Controller** at datacontroller.administration@ema.europa.eu or the **EMA Data Protection Officer** at dataprotection@ema.europa.eu.

You also have the right to lodge a complaint with the **European Data Protection Supervisor (EDPS)** at any time at the following address:

- Email: edps@edps.europa.eu
- Website: www.edps.europa.eu
- Further contact information: www.edps.europa.eu/about-edps/contact_en