



EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

3 January 2024  
EMA/233274/2021

## European Medicines Agency's Privacy Statement For the visitor management application

This Privacy Statement explains the most essential details of the processing of personal data by the European Medicines Agency (hereinafter "EMA" or "Agency") in the context of operating the visitor management application. This activity includes the collection, storage and internal use of the personal details of the host and the visitor, i.e. new staff (including interims and trainees), contractors, delegates, industry visitors and staff or contractors, in case of forgotten permanent badge.

### 1. Who is responsible for your data?

#### 1.1. Who is the data controller?

The European Medicines Agency ("EMA") is ultimately responsible to comply with your data protection rights and freedoms. On behalf of EMA, the Head of the Administration and Corporate Management Division of EMA is appointed as a 'Data Controller' to ensure the lawful conduct of this processing operation.

The contact details of the Data Controller are the following:  
[DataController.Administration@ema.europa.eu](mailto: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 in the context of operating the visitor management application, and, in particular, to carry out the following activities: booking in visitors, contractors, delegates, staff newcomers or any of them in case of forgotten permanent badges.

The name and contact details of the data processor(s) are the following:

**Security company:**

SECURITAS Beveiliging B.V.,  
Address: De Corridor 3<sup>a</sup>, 3621 ZA Breukelen ,  
Email: [dataprotectionofficer@securitas.nl](mailto:dataprotectionofficer@securitas.nl)

**Reception and hosting contracted company:**

SPIRIT Hostess Services Promo Adviezen B.V.  
Address: General Aviation Terminal, Thermiekstraat 30, 1117 BC Schiphol-Oost  
Email: [info@spirithospitality.nl](mailto:info@spirithospitality.nl)

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**Official address** Domenico Scarlattilaan 6 • 1083 HS Amsterdam • The Netherlands

**Address for visits and deliveries** Refer to [www.ema.europa.eu/how-to-find-us](http://www.ema.europa.eu/how-to-find-us)

**Send us a question** Go to [www.ema.europa.eu/contact](http://www.ema.europa.eu/contact) **Telephone** +31 (0)88 781 6000

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## **2. Purpose of this data processing**

The visitor management application is necessary for the management of visitors coming to the Agency. The personal data entered in facilitates the identification of the visitor and his/her host, as well as ascertaining that the visit is expected and genuine. In addition, it allows to keep a record of staff newcomers, as well as contractors, delegates and staff who forget their permanent badge. All visits and visitors are registered through this application which subsequently then sends an automatic feed (software script) to the Access Control System application, ensuring that all visitors are registered in the latter, when arriving to the Agency.

### **2.1. Personal Data concerned**

In the visitor management database, EMA staff members (the host) enter the data of all visitors, contractors, delegates and staff newcomers (including interim and trainee staff). The data entered in the database includes - name and surname of host (and alternate host), name and surname of visitor/s, date, time and purpose of the visit.

### **2.2. Legal Basis**

The processing of data within the visitor management application is necessary for the performance of the Agency's tasks carried out in the public interest (mandated by Regulation (EC) No 726/2004) and in line with Article 1e(2) Staff Regulations of Officials and the Conditions of Employments of Other Servants with regard to health and safety standards and 0076 Security Policy, specifically its annex "Internal Guidance on Access Control". In addition, these processing activities are connected to activities required for the management and functioning of the Agency (e.g. security and physical protection measures, mandatory registration of on-site presence, measures to protect information processing facilities, health and safety standards).

Accordingly, the lawfulness of this data processing is based on Article 5(1)(a) of Regulation (EU) 2018/1725 with reference to Recital 22 of that Regulation.

In this regard, please note that you have the right to object against the processing as explained in Section 5 below.

## **3. How long do we keep your data?**

The data is retained for 6 months from the date of the visit to align with the records held in the Access Control System.

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

Information included in the visitor management application is accessed and processed internally by EMA staff members within EMA Administration and Corporate Management Division on a need-to-know basis and contractors within Security and Reception Services responsible for managing visitors at their arrival.

EMA managers may be given access to the application data when requested in the framework of administrative enquiries or disciplinary procedures. Data from the system may be provided to national law enforcement authorities or the DG Security, European Commission upon written request and duly

authorized by the data controller in case of crime prevention or investigations regarding threats to EMA security.

## 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 Privacy Statement 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 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 Privacy Statement, hosted at [www.ema.europa.eu/en/about-us/legal/privacy-statement](http://www.ema.europa.eu/en/about-us/legal/privacy-statement).
- **Right to object** – You have the right to object at any time to this processing on grounds related to your particular situation. If you do so, EMA may only continue processing your personal data if it demonstrates overriding legitimate grounds to do so or if this is necessary for the establishment, exercise or defence of legal claims.

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 privacy notice, please refer to the contents of the general EMA Privacy Statement: [www.ema.europa.eu/en/about-us/legal/privacy-statement](http://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 Privacy Statement or the general EMA Privacy Statement, please contact the **Data Controller** at [DataController.Administration@ema.europa.eu](mailto:DataController.Administration@ema.europa.eu) or the **EMA Data Protection Officer** at [dataprotection@ema.europa.eu](mailto: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](mailto:edps@edps.europa.eu)
- Website: [www.edps.europa.eu](http://www.edps.europa.eu)
- Further contact information: [www.edps.europa.eu/about-edps/contact\\_en](http://www.edps.europa.eu/about-edps/contact_en)